



Weston Solutions, Inc.
5599 San Felipe, Suite 700
Houston, Texas 77056
713-985-6600 • Fax 713-985-6703
www.westonsolutions.com

29 July 2015

Mr. Michael Pheeny
US Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

RE: Tronox Navajo Area Uranium Mines (NAUM) Sections 35/36 (Cliffside) Mines
Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP)
EPA Contract No.: EP-W-06-042
Task Order 0041

Submitted via email on 29 July 2015

Dear Mr. Pheeny:

Please find attached the Final Tronox NAUM Sampling and Analysis Plan (SAP) per requirements outlined in Task Order 0041 START Statement of Work for Sections 35/36 (Cliffside) Mines Removal Site Assessment (RSA) and Engineering Evaluation and Cost Analysis (EE/CA) dated 12 June 2015. The SAP includes a Quality Assurance Project Plan (QAPP) and a Quality Assurance Sampling Plan (QASP) as Appendices A and B, respectively. The HASP, provided as a separate pdf file, presents site-specific safety guidance and requirements for Weston's on-site personnel.

Please do not hesitate to contact me should you have any questions.

Very truly yours,
Weston Solutions, Inc.

Cecilia Shappee

Cecilia H. Shappee, P.E.
Program Manager

cc: Mr. Will LaBombard (EPA)
Mr. Warren Zehner (EPA)
Mr. Jon Rinehart (EPA)
Ms. Rena McClurg (EPA)
Mr. David Bordelon (Weston)

HEALTH AND SAFETY PLAN
FOR THE
NON-TIME CRITICAL REMOVAL SUPPORT WORK PLAN
TRONOX NAVAJO AREA URANIUM MINES
SECTIONS 35/36 (CLIFFSIDE) MINES
MCKINLEY COUNTY, NEW MEXICO

Prepared for

U.S. Environmental Protection Agency Region 6
Will LaBombard, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. EP-W-06-042
Task Order No. 0041
WESTON Work Order No. 20406.012.041.4101.01
NRC No: N/A
CERCLIS No: NMN000607481
FPN: N/A
EPA TOMs: Warren Zehner/Jon Rinehart
START-3 PTLs: David Bordelon/Robert Sherman

Prepared by

Weston Solutions, Inc.
Cecilia Shappee P.E., Program Manager
5599 San Felipe, Suite 700
Houston, Texas 77056
(713) 985-6600

WESTON - EPA REGION 6 START-3 Contract



Site Assessment

SITE SPECIFIC HEALTH AND SAFETY PLAN

1. SITE INFORMATION

Prepared by: Samuel Cheek	Contract # EP-W-06-042 Task Order: TO-41 and TO-42	WO: 20406.012.041.4101.02	Date Prepared: 6/24/2015 Field Work to begin: 7/13/2015
FPN# N/A		CERCLA ID#	
START PTL (Name/ Number): Robert Sherman / 225-573-9785 Olin Garren/ 865-255-5235	START FSO/EC Officer (Name/ Number): Robert Sherman / 225-573-9785 Sam Cheek 972-977-1579	OSC R1 (Name/ Number): Warren Zehner 214-789- 1585 Jon Rinehart / 214-789-1713	Alternate OSC (Name/Number): TBD
Site Address: Field site area :Section 35 and 36 of McKinley County FOOC: 4071 HWY 605 Milan, NM 87021 Grants office: 825 E Santa Fe Ave. Grants, NM 87020			
Site History: This HASP specifically covers sites within the former mining operations of Tronox/Kerr McGee operations in section 35 and section 36 of the Tronox Navajo Area Uranium Mines (Tronox NAUM). The mining operations in Section 35 occurred from 1971 to 1985 and produced approximately 2.5 million tons of uranium ore. Mining operations in Section 36 occurred from 1960 through 1984 and produced approximately 893,000 tons of uranium ore. Both mines were considered wet mines due to the high volume of water produced and discharged from the mines to the local drainages near the mines. The mine shafts for both mines have been backfilled with uranium mill tailings as approved by NMED to prevent mine collapse at the mine sites. Readings collected during a site visit showed elevated levels within sections 35 and 36. The readings were as high as 1100 microR/hr and 900,000 cpm at the southern area in Section 35.			
START Scope of Work/Tasks: (1) Mob/Demob from Sites –Task Order 41 (2) Site Reconnaissance, Ecological Characterization, Hydrogeological Assessment–Task Order 41 (3) Drilling operations –Task Order 41 (4) Collection of Soil Samples –Task Order 41 (5) Geotechnical Survey –Task Order 41 (6) Operation of MCA –Task Order 42 (7) FOOC and Grants office administrative duties –Task Order 42			

2. SITE HEALTH AND SAFETY PLAN REVIEW AND APPROVAL

	Name	Signature	Date
Reviewed by: SO/DSM	Sam Cheek		7/1/2015
Approved by: Project Manager	David Bordelon		
Reviewed and Approved by: PTL/Scope of Work Leader and site EC officer	Robert Sherman		

Vehicle Use Assessment and Selection

Driving is one of the most hazardous and frequent activities for WESTON Employees. The most appropriate type vehicle(s) authorized for use on this project is/are:

1. 4x4 Sport Utility Vehicle
2. UTV-Will require on-site training for personnel to operate
- 3.
- 4.

The following Project Team Member's qualifications and experience in driving these types of vehicles was evaluated and found to be acceptable (indicate vehicle type(s) number next to employee name). Team Member's driving the EPA START box truck and/or ambulance needs to have a road test and DOT physical clearance every 2 years.

1. Robert Sherman (1,2)
2. Olin Garren (1,2)
3. Sam Cheek (1,2)4. Larry Howard (1,2)4. Keith Delhomme (1,2)
6. Robert Schoenfelder, CHP (1,2)
7. Paola Strong (1,2)

*The project site was evaluated and a **Traffic Control Plan** ☐ is required ☒ is not required.*

During any driving on-site a flag or other form of visual identification will be used on the vehicles at all times to ensure that the vehicle can be seen by passing traffic.

3. TRAINING REQUIREMENTS (Attach Personnel's EHS Track Training/Medical Summary Page)

<input checked="" type="checkbox"/>	40-Hour HAZWOPER -	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	8-Hour Annual Refresher-	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	Blood Borne Pathogen-	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	CPR -	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	First Aid-	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	SHSC/FSO Training -	<input type="checkbox"/> Required for ALL personnel	<input checked="" type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	10-Hr Construction Safety -	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	30-Hr Construction Safety-	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	Confined Space Training-	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	Competent Person Fall Prevention and Protection-	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	Competent Person Trenching and Excavation-	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	Function Specific Dangerous Goods Shipping-	<input type="checkbox"/> Required for ALL personnel	<input checked="" type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	Site-Specific Training, Specify: orientation -	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	Site-Specific Training, Specify: <u>ATV/UTV safety training</u> -	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input type="checkbox"/>	Site-Specific Training, Specify: _____ -	<input type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only
<input checked="" type="checkbox"/>	Other: 4-Hr. Radiation Awareness _____ -	<input checked="" type="checkbox"/> Required for ALL personnel	<input type="checkbox"/> Required for FSO/PTL only

4. MEDICAL SURVEILLANCE REQUIREMENTS (Attach Personnel's EHS Track Training/Medical Summary Page)

☒ Baseline/annual physical examination to include spirometry with occupational physician clearance.
☒ Required for ALL personnel ☐ Required for FSO/PTL only ☐ Other:

☐ Two-Year DOT physical examination with physician certification (DOT card).

☒ Annual Fit Test

☒ Qualitative Fit Test- ☒ Required for ALL personnel ☐ Required for FSO/PTL only

☐ Quantitative Fit Test- ☐ Required for ALL personnel ☐ Required for FSO/PTL only

☐ EPA periodic drug screening - ☐ Required for ALL personnel ☐ Required for FSO/PTL only

☒ Site-specific medical monitoring protocol, Specify: All personnel performing field tasks will be required to wear personal radiation dosimeters

☒ Required for ALL personnel ☐ Required for FSO/PTL only

☐ Asbestos worker medical exam and physician clearance

☐ Required for ALL personnel ☐ Required for FSO/PTL only

5. SITE SECURITY ASSESSMENT

SITE SECURITY ASSESSMENT FORM	
Site Description	
<ul style="list-style-type: none"> Client: USEPA Region 6 <ul style="list-style-type: none"> Site Name: San Mateo Legacy Mine Address, City, & State: Cibola and McKinley Counties NM Project Start Date & Estimated Completion Date: May – August 2015 	
Communication with <u>SITE</u> Point of Contact (POC)	
<ul style="list-style-type: none"> Site POC Name and Contact Information: n/a Date Contacted: Site Setting: Commercial, Industrial, Residential, Other: rural Conversation Details: 	
Threat Indicators	
<ul style="list-style-type: none"> http://www.spotcrime.com – Website that allows you to search by state, city, and plug in address. List the number of arrests, assaults, burglary, robbery, shootings, and theft in your general area: <div style="text-align: center; margin-left: 40px;"> AR - 0 AS - 0 BG - 0 ROB - 0 SHT - 0 TFT - 0 </div> Other relevant details: N/A 	
Security Countermeasures	
<ul style="list-style-type: none"> Will conduct field work during daylight hours: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Buddy System at ALL times: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If no, why? Routine phone check-ins with PM or PC SO: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Badges required at all times: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Site fenced/secure: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Site security guards/hired protection: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Other: Site Access Agreements will be present on-site for all properties accessed. 	
Closest Police Station / Emergency Services	
<ul style="list-style-type: none"> Police station location and phone number: Grants, New Mexico / (505) 287-2983 Did you contact the police station: <input type="checkbox"/> YES (Required for High Risk) <input checked="" type="checkbox"/> NO If so, conversation details: 	
Approval	
Security Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L Field Safety Officer Name: Robert Sherman/Olin Garren Signature: PM Name: David Bordelon Signature: Safety Officer Name: S. Cheek Signature: Elevated to Division Safety Manager: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO: If no, why not?	

6. TASKS/DURATION (Fill in as appropriate)

Tasks	Duration (Hours/Days)	PPE Level
<input checked="" type="checkbox"/> Daily Mob and Demob	2/90	D
<input checked="" type="checkbox"/> Site Reconnaissance, Ecological Characterization, Hydrogeological Assessment	10/14	D
<input checked="" type="checkbox"/> Drilling operations	12/7	D, C if needed
<input checked="" type="checkbox"/> Collection of Soil Samples	10/30	D
<input checked="" type="checkbox"/> Geotechnical Survey	10/30 days	D
<input checked="" type="checkbox"/> Operation of MCA	AS Needed	D modified
<input checked="" type="checkbox"/> FOOC and Grants Office Administrative work	10/90	D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D
<input type="checkbox"/>		A / B / C / D

7. PHYSICAL HAZARDS

- ☒ Buddy System – The buddy or line of sight system is mandatory for all site personnel.
- ☒ Heat Stress – The FSO shall generally be guided by the Weston OP in determining work/rest periods. Fluids shall be available at all times and encouraged during rest periods.
- ☒ Cold Stress – The FSO shall generally be guided by the Weston OP in determining work/rest periods. Workers shall be provided with adequate warm clothing, rest opportunities and exposure protection. Warm and/or sweet fluids shall also be provided during rest periods.
- ☒ Precipitation/Inclement Weather – Personnel should be aware of lightning, the increased risk of slips and falls on wet surfaces, and exposure effects caused by wet clothing. Personnel should dress appropriately.
- ☒ Lighting – Fixed or portable lighting shall be maintained for dark areas or work after sunset to ensure that sufficient illumination is provided.
- ☐ Work Near Water – All personnel working in boats, on docks or generally within 10 feet of water deeper than 3 feet shall wear approved personal flotation devices (PFDs) or work vests and wading boots as appropriate.
- ☒ High Noise Levels – Hearing protection shall be used in high noise areas (exceeding 85 dBA – generally where noise levels require personnel to raise their voices to be heard) as designated by the FSO.
- ☐ Electrical Hazards – Electrical hazards should be identified on the site work zone map and marked out as appropriate. All electrical equipment should be used with a ground fault circuit interrupter (GFCI).
- ☒ Trip Hazards – Open manholes, pits, trenches or similar hazards should be noted on the site map and should be marked off on site as appropriate.
- ☐ Helicopter/Airplane Operations – Pilots shall provide safety briefings for all passengers.
- ☒ Terrain (Slips, Trips and Falls) – All personnel will exercise due caution when walking through areas of uneven terrain and undergrowth to ensure proper footing.
- ☒ Underground/Overhead Utilities – All underground utilities must be marked out prior to conducting intrusive activities. At least 15 feet of distance must be maintained with overhead utilities.
- ☐ Confined Spaces – Confined spaces will not be normally entered by response personnel. If a confined space is to be entered, a specific confined space entry work permit will be developed for that operation.
- ☐ Drum Handling – Drums must be handled in accordance with 29 CFR 1910.120. Containers must be labeled and constructed in accordance with EPA (40 CFR 264-265, and 300), and DOT (49 CFR 171-178) regulations. Temporary holding/staging areas for drums and other containers shall be constructed to contain spillage, runoff or accidental release of materials. Manual lifting and handling of drums shall be kept to a minimum. To the extent possible, mechanical devices, drum slings or other mechanical assist devices designed for that purpose should be used.
- ☒ Motor Vehicles – Drivers shall maintain a safe speed at all times and shall not be allowed to operate vehicles in a reckless manner. Seat belts will be worn. In backing situations where the rear of the vehicle cannot be clearly seen, one person shall act as a ground guide to assist the driver. In situations where ground clearance and soil conditions are not known, one person shall dismount and act as a guide. (Also See Next Page)

8. BIOLOGICAL HAZARDS

- ☒ *Insect Stings* – Hornet, wasp or bee stings, mosquito. Personnel should avoid the nesting areas of these insects. Personnel who are allergic to these insects should carry bee sting kits. Personnel may find repellants containing DEET effective in keeping these insects away.
- ☒ *Poisonous Spiders* – Black widow or brown recluse. Wear gloves when working in areas where these spiders may be present. If bitten, seek medical attention immediately.
- ☐ *Ticks* – Personnel should wear Tyvek when working in wooded areas as a precaution. Barring this, personnel should wear light colored clothing and tuck pants into socks. Personnel should also wear a repellant containing DEET. Personnel should use the buddy system and perform a tick check after exiting wooded areas. Suspected bites should be reported immediately.
- ☒ *Animal Bites* – Personnel should use extreme caution when in contact with strange animals. If bitten, seek medical attention immediately.
- ☒ *Snake Bites* – Personnel should use extreme caution when working in areas known to be inhabited by snakes. Snake leggings or chaps should be worn as a precaution. If bitten, seek medical attention immediately.
- ☒ *Poisonous Plants* – Personnel should use caution when working in wooded areas. Tyvek suits may be worn as a precaution. All personnel should wear Ivy Block.
- ☐ *Etiological Hazards* – Personnel should use caution when working in areas that may contain etiologi- cal hazards. Tyvek suits and gloves may be worn as a precaution. All personnel should frequently wash their hands.

9. RADIOLOGICAL HAZARDS

- ☒ *Ionizing Radiation* – Any encounter with ionizing radiation requires the support from a Certified Health Physicist (CHP). All START personnel must wear a personal dosimeter such as a TLD and/or Self-Reading Dosimeter (SRD). Personnel who are temporary on-site will be issued an dosimeter and the results documented in a visitor log. The visitor log will include the dose for the individual and the areas which they visited.
- ☐ *Non-Ionizing Radiation* – To the extent possible personnel should maintain a minimum distance of 30 feet from devices emitting radio or microwaves.
- ☒ *UV Light Exposure* – Personnel should dress so as to cover as much exposed skin as possible. Personnel should use a sunscreen with a protection factor (PF) of 15 or greater and should wear tinted safety glasses.

10. CHEMICAL HAZARDS TO PERSONNEL *The following chemicals are known or suspected to be at this site:*

Contaminants of Concern		Chemicals/Materials brought on-site	
Contaminant Name	Alpha Particle Units (meV)	Chemical Name	Quantity
Uranium	Unknown	All SDSs will be maintained in a folder onsite.	
Metals	Unknown		

Web Links

1. NIOSH Pocket Guide (Electronic Version) - <http://www.cdc.gov/niosh/npg/npgname-a.html>
2. Vermont SIRI SDS Collection - <http://hazard.com/SDS/>

HEALTH AND SAFETY EVALUATION

WESTON FLDs - Maintained on FSO's/PTL's Computer

Physical Hazard Condition	Physical Hazard	Attach OP	WESTON OP Titles
Loud noise	Hearing loss/disruption of communication	<input checked="" type="checkbox"/>	Section 7.0 - ECH&S Program Manual Occupational Noise & HC Progr
Inclement weather	Rain/humidity/cold/ice/snow/lightning	<input checked="" type="checkbox"/>	FLD02 - Inclement Weather
Steam heat stress	Burns/displaced oxygen/wet working surfaces	<input type="checkbox"/>	FLD03 - Hot Process - Steam
Heat stress	Burns/hot surfaces/low pressure steam	<input type="checkbox"/>	FLD04 - Hot Process - LT3
Ambient heat stress	Heat rash/cramps/exhaustion/heat stroke	<input checked="" type="checkbox"/>	FLD05 - Heat Stress Prevention/Monitoring
Cold stress	Hypothermia/frostbite	<input checked="" type="checkbox"/>	FLD06 - Cold Stress
Confined spaces	Falls/burns/drowning/engulfment/electrocution	<input type="checkbox"/>	FLD08 - Confined Space Entry
Industrial Trucks	Fork Lift Truck Safety	<input type="checkbox"/>	FLD09 - Powered Industrial Trucks
Improper lifting	Back strain/abdomen/arm/leg muscle/joint injury	<input checked="" type="checkbox"/>	FLD10 - Manual Lifting/Handling Heavy Objects
Uneven surfaces	Vehicle accidents/slips/trips/falls	<input checked="" type="checkbox"/>	FLD11 - Rough Terrain
Poor housekeeping	Slips/trips/falls/punctures/cuts/fires	<input checked="" type="checkbox"/>	FLD12 - Housekeeping
Structural integrity	Crushing/overhead hazards/compromised floors	<input type="checkbox"/>	FLD13 - Structural Integrity
Hostile persons	Bodily injury	<input type="checkbox"/>	FLD14 - Site Security
Improper cylinder. handling	Mechanical injury/fire/explosion/suffocation	<input type="checkbox"/>	FLD16 - Pressure Systems - Compressed Gases
Water hazards	Poor visibility/entanglement/drowning/cold stress	<input type="checkbox"/>	FLD17 - Diving
Water hazards	Drowning/heat/cold stress/hypothermia/falls	<input type="checkbox"/>	FLD18 - Operation and Use of Boats
Water hazards	Drowning/frostbite/hypothermia/falls/electrocution	<input type="checkbox"/>	FLD19 - Working Over Water
Vehicle hazards	Struck by vehicle/collision	<input checked="" type="checkbox"/>	FLD20 - Traffic
Explosions	Explosion/fire/thermal burns	<input type="checkbox"/>	FLD21 - Explosives
Moving mechanical parts	Crushing/pinch points/overhead hazards/electrocution	<input type="checkbox"/>	FLD22 - Earth Moving Equipment
Moving mech. parts	Overhead hazards/electrocution	<input type="checkbox"/>	FLD23 - Cranes, Rigging, and Slings
Working at elevation	Overhead hazards/falls/electrocution	<input type="checkbox"/>	FLD24 - Aerial Lifts/Man lifts
Working at elevation	Overhead hazards/falls/electrocution	<input type="checkbox"/>	FLD25 - Working at Elevation
Working at elevation	Overhead hazards/falls/electrocution/slips	<input type="checkbox"/>	FLD26 - Ladders
Working at elevation	Slips/trips/falls/overhead hazards	<input type="checkbox"/>	FLD27 - Scaffolding
Trench cave-in	Crushing/falling/overhead hazards/suffocation	<input type="checkbox"/>	FLD28 - Excavating/Trenching
Physiochemical	Explosions/fires from oxidizing, flam./corr. Material	<input type="checkbox"/>	FLD30 - Hazardous Materials Use/Storage
Physiochemical	Fire and explosion	<input type="checkbox"/>	FLD31 - Fire Prevention/Response Plan Required
Physiochemical	Fire	<input checked="" type="checkbox"/>	FLD32 - Fire Extinguishers Required
Structural integrity	Overhead/electrocution/slips/trips/falls/fire	<input type="checkbox"/>	FLD33 - Demolition
Electrical	Electrocution/shock/thermal burns	<input checked="" type="checkbox"/>	FLD34 - Utilities
Electrical	Electrocution/shock/thermal burns	<input type="checkbox"/>	FLD35 - Electrical Safety
Burns/fires	Heat stress/fires/burns	<input type="checkbox"/>	FLD36 - Welding/Cutting/Brazing/Radiography
Impact/thermal	Thermal burns/high pressure impaction/heat stress	<input type="checkbox"/>	FLD37 - Pressure Washers/Sand Blasting
Impaction/electrical	Smashing body parts/pinching/cuts/electrocution	<input checked="" type="checkbox"/>	FLD38 - Hand and Power Tools
Poor visibility	Slips/trips/falls	<input checked="" type="checkbox"/>	FLD39 - Illumination
Fire/explosion	Burns/impaction	<input type="checkbox"/>	FLD40 - Storage Tank Removal/Decommissioning
Communications	Disruption of communications	<input checked="" type="checkbox"/>	FLD41 - Std. Hand/Emergency Signals
Energy/release	Unexpected release of energy	<input type="checkbox"/>	FLD42 - Lockout/Tag-out
Biological Hazards	Biological Hazards at site	<input checked="" type="checkbox"/>	FLD43 - Biological Hazards, FLD 43A - Animals
Biological Hazards/BBP	Biological Hazards/BBP at site/First Aid Providers	<input checked="" type="checkbox"/>	FLD44 - Biological Hazards - Bloodborne Pathogens Exposure Control Plan - First Aid Providers
Infectious Waste	Infectious Waste at site/BBP/ at site/Infectious Waste	<input type="checkbox"/>	FLD45 - Biological Hazards - Bloodborne Pathogens Exposure Control Plan - Work With Infectious Waste
Lead Contaminated sites	Lead poisoning	<input type="checkbox"/>	FLD46 - Control of Exposure to Lead
Puncture/cuts	Cuts/ dismemberment/gouges	<input type="checkbox"/>	FLD47 - Clearing, Grubbing and Logging Operations

Physical Hazard Condition	Physical Hazard	Attach OP	WESTON OP Titles
Not applicable	Not applicable	<input checked="" type="checkbox"/>	FLD48 – Federal, State, Local Regulatory Agency Inspections
Not applicable	Exposure to hazardous materials/waste	<input checked="" type="checkbox"/>	FLD49 – Safe Storage of Samples
Cadmium	Exposure Control	<input type="checkbox"/>	FLD50 – Cadmium Exposure Control Plan
Process Safety Procedure	Safety Procedure	<input type="checkbox"/>	FLD51 – Process Safety Procedure
Asbestos	Asbestos Exposure	<input type="checkbox"/>	FLD52 – Asbestos Exposure Control Plan
Hexavalent Chromium	Exposure Control Plan	<input type="checkbox"/>	FLD53 – Hexavalent Chromium Exposure Control Plan
Benzene	Exposure Control Plan	<input type="checkbox"/>	FLD54 - Benzene Exposure Control Plan
Hydrofluoric acid	Working with HF	<input type="checkbox"/>	FLD55 – Working with Hydrofluoric Acid
Moving drill rig parts	Crushing/pinch points/overhead hazards/electrocution	<input checked="" type="checkbox"/>	FLD56 – Drilling Safety
Vehicles/driving	Accidents,/fatigue/cell phone use	<input checked="" type="checkbox"/>	FLD 57 – Motor Vehicle Safety
Improper material handling	Back injury/crushing from load shifts/equipment/tools	<input type="checkbox"/>	FLD 58 – Drum Handling Operations
COC decontamination	COCs/slip,trip, and falls/waste generation/environmental compliance/PPE	<input checked="" type="checkbox"/>	FLD59 - Decontamination
Drilling hazards	Electrocution/overhead hazards/pinch points	<input checked="" type="checkbox"/>	Environmental Remediation Drilling Safety Guideline - 2005
Fatigue	Long work hours	<input checked="" type="checkbox"/>	FLD60 – Employee Duty Schedule
Benzene/Gasoline	Benzene exposure	<input type="checkbox"/>	FLD61 – Gasoline Contaminant Exposure
AED Program Guidelines	Heart failure	<input type="checkbox"/>	FLD 62 – 2009 AED Program Guidelines
XRF Analyzers	X-ray exposure	<input type="checkbox"/>	FLD 63 – Using Handheld XRF Analyzers
Working Alone	Working alone	<input checked="" type="checkbox"/>	FLD 64 – Employees Working Alone

11. TASK-BY-TASK ASSESSMENTS

Task-By-Task Assessment (COMPLETE ONE SHEET FOR EACH TASK)	
TASK DESCRIPTION	
Task 1. Mob/Demob from Sites Mobilization in vehicle to and from the FOOC or Grants office to the work site. Employees may need to pull a trailer and should be trained prior to attempting any trailer pulling.	
EQUIPMENT REQUIRED/USED (Be specific, e.g., hand tools, heavy equipment, instruments, PPE)	
High Visibility Reflective flags attached to vehicle and trailer. 4x4 Trucks GPS UTV- Trailers for UTV	
POTENTIAL HAZARDS/RISKS	
Chemical	
<input type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input type="checkbox"/> L What justifies risk level? NA	
Physical	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? Uneven and rocky terrain will be encountered. Must approach 4x4 roads carefully to avoid roll-over. Driver's need to practice good hand position on the steering wheel, and know the position of the front and rear differentials or other low ground clearance points. Sites will be remote making emergency response an important consideration. Walking the area if there are vision obstructions is suggested due to the uneven terrain and sharp rocks that may puncture tires.	
Biological	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? Mountain lions, feral cattle, elk, and black bear are known to live in the area. Personnel will be on the lookout for poisonous snake and upgrade PPE to include snake chaps if any areas are considered high risk for possible snake bit.	
RADIOLOGICAL	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? In general, drilling locations should be at or near background radiation levels. However radiation levels should be monitored to insure personnel are not staying in areas of elevated radiation levels. Follow Action Levels for Radiation level exposure in section 5. All visible airborne dust should be considered contaminated thus implemented stop work or engineering controls to mitigate the potential internal exposure hazard.	
LEVELS OF PROTECTION/JUSTIFICATION	
Level D PPE- Snake Chaps will be available onsite if personnel encounter areas with a high or expected to be high concentration of venomous snakes. TLD badges will be used to monitor dose to employees. Employees must carry a Ludlum Model 19 to insure they are aware of the radiation levels in the area and can plan work activities.	

SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED

Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures. Drivers receive competent person training for operation of a UTV, pulling a trailer and how to change a tire, if necessary.

11. TASK-BY-TASK ASSESSMENTS (Continued)

Task-By-Task Assessment (COMPLETE ONE SHEET FOR EACH TASK)

TASK DESCRIPTION

Task 2. Site Reconnaissance, Ecological Characterization, Hydrogeological Assessment- Time Frame: Beginning July 2015

Personnel will traverse the site performing an assessment of the property as part of the initial site reconnaissance/assessment, ecological characterization, and hydrogeological assessment.

EQUIPMENT REQUIRED/USED

(Be specific, e.g., hand tools, heavy equipment, instruments, PPE)

Safety Glasses	Steel Toed Boots	Camera
I-PAD	Ludlum Model 19	Ludlum 2221 with 44-10 probe
GPS	High Visibility Reflective Vest	BOB buggies
Hard Hat-If overhead hazard exists	Logbook	
Soft hat head covering, Snake Chaps (if hazard encountered)		

POTENTIAL HAZARDS/RISKS

Chemical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level? The site is open desert, where the main concern is radiation exposure. No chemicals are known to be present in the area.

Physical

☒ Hazard Present Risk Level: ☐ H ☒ M ☐ L

What justifies risk level?

Slip/trip/fall hazards include overgrown vegetation, burrows, tree roots, loose rock, ice (water), and uneven terrain. Dry air and higher elevation increase the rate of dehydration through evaporation, personnel should increase water intake. Weather can change rapidly, forecasts should be observed on a daily basis. Mine shafts may exist and need to be marked and barricaded with fencing. Any mine shafts found should be communicated to the group. Operations of pushing buggies or carrying equipment during surface gamma radiation surveys. Utilizing an UTV during all types of assessment including retro fitting the UTV to use as a gamma survey buggy. Sunscreen for UVA and UVB will be applied to all exposed skin and long sleeve shirts with wide brimmed hats will be utilized to protect against sunburn.

Biological

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Mountain lions, feral cattle, elk, and black bear are known to live in the area. Abandoned buildings pose a risk from rodents, snakes, and bats. Personnel will avoid entering abandoned buildings and be aware of metal shrapnel lying on the ground. Personnel will be on the lookout for poisonous snake and upgrade PPE to include snake chaps if any areas are considered high risk for possible snake bit.

RADIOLOGICAL	
<input checked="" type="checkbox"/> Hazard Present What justifies risk level?	Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L In general, locations should be at or near background radiation levels. However radiation levels should be monitored to insure personnel are not staying in areas of elevated radiation levels. Follow Action Levels for Radiation levels exposure in Section 16 of this plan. Many areas of elevated radiation levels exist at the site and stay time within the areas should be kept to a minimum. All visible airborne dust should be considered contaminated and stop work orders or engineering controls implemented to mitigate the potential internal exposure hazard. Air particulate sampling will be conducted as indicated in Section 16 to ensure compliance with air effluent limits.
LEVELS OF PROTECTION/JUSTIFICATION	
Level D PPE –Snake Chaps will be available onsite if personnel encounter areas with a high or expected to be high concentration of venomous snakes. Safety vest and leather hiking shoes are required. Hard Hats will be required if any overhead hazards are encountered. Vehicles and trailers will be marked with high visibility flags. Training will be provided for personnel who pull trailers or operate the UTV.	
SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED	
Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures:	

11. TASK-BY-TASK ASSESSMENTS (Continued)

Task-By-Task Assessment (COMPLETE ONE SHEET FOR EACH TASK)			
TASK DESCRIPTION			
Task 3. Drilling Operations – Time Frame is TBD Conduct drilling of up to 3 test borings within the location of the on-site repository			
EQUIPMENT REQUIRED/USED (Be specific, e.g., hand tools, heavy equipment, instruments, PPE)			
Safety Glasses	Steel Toed Boots	Camera	Augers
I-PAD	Model 19	Drill Rig	
GPS	High Visibility Reflective Vest		
Hard Hat (If overhead hazard exists)		Logbook	
Soft hat head covering, Snake Chaps (if hazard encountered)			
POTENTIAL HAZARDS/RISKS			
Chemical			
<input checked="" type="checkbox"/> Hazard Present What justifies risk level?	Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L The site is open desert, where the main concern is radiation exposure. No chemicals are known to be present in the area. Heavy Metals contamination maybe encounters and will be sampled for.		
Physical			
<input checked="" type="checkbox"/> Hazard Present What justifies risk level?	Risk Level: <input type="checkbox"/> H <input checked="" type="checkbox"/> M <input type="checkbox"/> L Slip/trip/fall hazards include overgrown vegetation, burrows, tree roots, loose rock, ice (water), and uneven terrain. Drill rig operations have many hazards including overhead hazard of the equipment itself. Dry air and higher elevation increase the rate of dehydration through evaporation, personnel should increase water intake. Weather can change rapidly, forecasts should be observed on a daily basis. Underground utility should be cleared before drilling operations begin. Sunscreen for UVA and UVB will be applied to all exposed skin and long sleeve shirts with wide brimmed hats will be utilized to protect against sunburn.		

Biological	
<input checked="" type="checkbox"/> Hazard Present	Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L
What justifies risk level? Mountain lions, feral cattle, elk, and black bear are known to live in the area. Abandoned buildings pose a risk from rodents, snakes, and bats. Personnel will avoid entering abandoned buildings and be aware of metal shrapnel lying on the ground. Personnel will be on the lookout for poisonous snake and upgrade PPE to include snake chaps if any areas are considered high risk for possible snake bit.	
RADIOLOGICAL	
<input checked="" type="checkbox"/> Hazard Present	Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L
What justifies risk level? In general, locations should be at or near background radiation levels. However radiation levels should be monitored to insure that areas where elevated radionuclide concentrations exist are identified quickly if encountered, and personnel are not staying in areas of elevated radiation levels. Follow Action Levels for Radiation level exposure in Section 16 of this plan. Stay time should be kept to a minimum within the areas of the site where elevated radiation levels exist. All visible airborne dust should be considered contaminated and stop work orders or engineering controls implemented to mitigate the potential internal exposure hazard. Air particulate sampling will be conducted as indicated in Section 16 to ensure compliance with air effluent limits.	
LEVELS OF PROTECTION/JUSTIFICATION	
Level D PPE -Snake Chaps will be available onsite if personnel encounter areas with a high or expected to be high concentration of venomous snakes. Safety vest and leather hiking shoes are required. Hard Hats will be required for drilling activities. Vehicles and trailers will be marked with high visibility flags.	
SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED	
Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures: Drilling subcontractors will be required to have radiation awareness training before being allowed on site.	

**Task-By-Task Assessment
(COMPLETE ONE SHEET FOR EACH TASK)**

TASK DESCRIPTION

Task 4. Collection of Soil Samples

Personnel will collect 250 soil samples from various location for comparative analysis.

EQUIPMENT REQUIRED/USED

(Be specific, e.g., hand tools, heavy equipment, instruments, PPE)

Safety Glasses	Steel Toed Boots	tubing
GPS	High Visibility Reflective Vest	Sample Jars
Nitrile Glove	Hard Hat-If overhead hazard exists	
Soft hat head covering	submersible pump	Snake Chaps

POTENTIAL HAZARDS/RISKS

Chemical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level? The site is open desert, where the main concern is radiation exposure. No chemicals are known to be present in the area. However proper PPE will be used to avoid dermal contact with the soil.

Physical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Slip/ trip/ fall hazards include overgrown vegetation, burrows, tree roots, loose rock, ice (water), uneven terrain. Dry air and higher elevation increase the rate of dehydration through evaporation, personnel should increase water intake. Weather can change rapidly, forecasts should be observed on a daily basis. Lifting of equipment and purge buckets will be the biggest physical hazard on-site. Personnel should wear appropriate PPE when cutting tubing. Sunscreen for UVA and UVB will be applied to all exposed skin and long sleeve shirts with wide brimmed hats will be utilized to protect against sunburn.

Biological

☒ Hazard Present Risk Level: ☐ H ☒ M ☐ L

What justifies risk level?

Mountain lions, feral cattle, elk, and black bear are known to live in the area. Abandoned buildings pose a risk from rodents, snakes, and bats. Personnel will avoid entering abandoned buildings and be aware of metal shrapnel lying on the ground. Personnel will be on the lookout for poisonous snake and upgrade PPE to include snake chaps if any areas are considered high risk for possible snake bit.

RADIOLOGICAL

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Soil samples will be analyzed by an onsite MultiChannel Analyzer (MCA) for gamma spectroscopy. Ten percent of the samples will be submitted to an off-site analysis. In general, locations should be at or near background radiation levels. However radiation levels should be monitored to insure that areas where elevated radionuclide concentrations exist are identified quickly if encountered, and personnel are not staying in areas of elevated radiation levels. Follow Action Levels for Radiation level exposure in Section 16 of this plan. Stay time should be kept to a minimum within the areas of the site where elevated radiation levels exist. All visible airborne dust should be considered contaminated and stop work orders or engineering controls implemented to mitigate the potential internal exposure hazard. Air particulate sampling will be conducted as indicated in Section 16 to ensure compliance with air effluent limits.

LEVELS OF PROTECTION/JUSTIFICATION

Level D modified PPE – Nitrile gloves are to be used for sampling activities. Booties and tyvek suits will also be available for site personnel to use if there is necessary. Snake Chaps will be available onsite if personnel encounter areas with a high or expected to be high concentration of venomous snakes.

SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED

Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures:

**Task-By-Task Assessment
(COMPLETE ONE SHEET FOR EACH TASK)****TASK DESCRIPTION**

Task 5. Geotechnical Survey
Utilize Ground Penetrating Radar (GPR) to evaluate possible debris burial areas.

EQUIPMENT REQUIRED/USED

(Be specific, e.g., hand tools, heavy equipment, instruments, PPE)

Safety Glasses	Steel Toed Boots	Camera
I-PAD	Model 19	GPR equipment
GPS units	High Visibility Reflective Vest	
Hard Hat (If overhead hazard exists)	Logbook	
Soft hat head covering,	Snake Chaps (if hazard encountered)	

POTENTIAL HAZARDS/RISKS**Chemical**

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level? The site is open desert, where the main concern is radiation exposure. No chemicals are known to be present in the area. Heavy Metals contamination maybe encounters and will be sampled for.

Physical

☒ Hazard Present Risk Level: ☐ H ☒ M ☐ L

What justifies risk level?

Slip/trip/fall hazards include overgrown vegetation, burrows, tree roots, loose rock, ice (water), and uneven terrain. GPR equipment can be heavy and will require stringent manual labor to operate. Dry air and higher elevation increase the rate of dehydration through evaporation, personnel should increase water intake. Weather can change rapidly, forecasts should be observed on a daily basis. Sunscreen for UVA and UVB will be applied to all exposed skin and long sleeve shirts with wide brimmed hats will be utilized to protect against sunburn.

Biological

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

Mountain lions, feral cattle, elk, and black bear are known to live in the area. Abandoned buildings pose a risk from rodents, snakes, and bats. Personnel will avoid entering abandoned buildings and be aware of metal shrapnel lying on the ground. Personnel will be on the lookout for poisonous snake and upgrade PPE to include snake chaps if any areas are considered high risk for possible snake bit.

RADIOLOGICAL

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L

What justifies risk level?

In general, locations should be at or near background radiation levels. However radiation levels should be monitored to insure that areas where elevated radionuclide concentrations exist are identified quickly if encountered, and personnel are not staying in areas of elevated radiation levels. Follow Action Levels for Radiation level exposure in Section 16 of this plan. Stay time should be kept to a minimum within the areas of the site where elevated radiation levels exist. All visible airborne dust should be considered contaminated and stop work orders or engineering controls implemented to mitigate the potential internal exposure hazard. Air particulate sampling will be conducted as indicated in Section 16 to ensure compliance with air effluent limits.

LEVELS OF PROTECTION/JUSTIFICATION
<p>Level D PPE –Snake Chaps will be available onsite if personnel encounter areas with a high or expected to be high concentration of venomous snakes. Safety vest and leather hiking shoes are required. Hard Hats will be required for drilling activities. Vehicles and trailers will be marked with high visibility flags.</p>
SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED
<p>Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures:</p> <p>Geo technical surveyors will be required to have radiation awareness training before being allowed on site. An employee with advanced radiation training will clear the areas before GPR work is included.</p>

**Task-By-Task Assessment
(COMPLETE ONE SHEET FOR EACH TASK)**

TASK DESCRIPTION

Task 6. Multi-Channel Analyzer (MCA) operation

Trained employees will operate the MCA to analyze onsite soil samples. The MCA will concentrate on the Bismuth 214 peak which is in equilibrium with Radium 226. Analysis will occur in the Grants office and sample processing will occur at the FOOC.

EQUIPMENT REQUIRED/USED

(Be specific, e.g., hand tools, heavy equipment, instruments, PPE)

MCA	32 oz Soil Jars	
500 ml Marinelli Jars	GM Pancake to measure surface contamination	
Electrical tape	Sieves	
Funnels	Dry mills for grinding rocks	Fume Hood with HEPA filters
5 gallon buckets	Ovens to dry soil samples	Metal Whisks
Humboldt Sieve shaker	Nitrile Gloves	Stainless Steel Mixing Bowls

POTENTIAL HAZARDS/RISKS

Chemical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L
What justifies risk level? No hazardous chemicals are known to be present in the area or within the samples.

Physical

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L
What justifies risk level?
Repetitive actions of soil processing could lead to ergonomic stress. The Sample Processing procedures are covered in the operations document for the activity.

Biological

☐ Hazard Present NA Risk Level: ☐ H ☐ M ☐ L
What justifies risk level?

RADIOLOGICAL

☒ Hazard Present Risk Level: ☐ H ☐ M ☒ L
What justifies risk level?
Dust from possible soil samples could be contaminated thus all soil samples will be opened under the fume hood to eliminate to the possibility of internal radiation exposures from airborne dust. Routine work area monitoring of gamma radiation levels, air particulates and radon, and surface contamination needs to be added here.

LEVELS OF PROTECTION/JUSTIFICATION

Level D PPE -Lab coats, eye protection and Nitrile gloves will be required when processing samples. See sample processing procedures for further explanation of the sample processing procedure.

SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED

Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures:

Task-By-Task Assessment (COMPLETE ONE SHEET FOR EACH TASK)	
TASK DESCRIPTION	
Task 7. FOOC and Grants Office Administrative Duties Contractor shall provide infrastructure support for the FOOC and Grants Command Post.	
EQUIPMENT REQUIRED/USED (Be specific, e.g., hand tools, heavy equipment, instruments, PPE)	
TBD	
POTENTIAL HAZARDS/RISKS	
Chemical	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? A site list of SDSs will be developed and posted on-site to include all hazardous chemicals and comply with the Weston hazardous communication (HAZCOM) program as mandated by OSHA.	
Physical	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? Good House keeping will be maintained to reduce any potential slips trips and fall hazards at both facilities. Monthly inspections will be recorded of the on-site Fire extinguishers. Ergonomic hazards will be reported and addressed as recognized. Ergonomic awareness will be preached such as making sure to lift with the knees and not the back. Driving hazards will be addressed by providing training for employees who are unfamiliar with pulling trailers and operating UTVs. Proper loading of equipment into trailers will also be addressed.	
Biological	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? Both facilities will be routinely cleaned. Any biological activity including but not limited to mice, snakes and insects will be trapped or killed. Any areas found to be contaminated with mouse or bird droppings will be immediately reported to the FSO.	
RADIOLOGICAL	
<input checked="" type="checkbox"/> Hazard Present Risk Level: <input type="checkbox"/> H <input type="checkbox"/> M <input checked="" type="checkbox"/> L What justifies risk level? In both work locations should be at or near background radiation levels. Radon results for the FOOC are pending and will be addressed if warranted. All field employees will receive advanced radiation training. Add routine monitoring of work areas for gamma levels, surface contamination, radon and particulates in air.	
LEVELS OF PROTECTION/JUSTIFICATION	
Level D modified PPE – Workers will wear leather shoes, pants, and T- shirts. Additional PPE requirements will be task specific.	
SAFETY PROCEDURES REQUIRED AND/OR FIELD OPS UTILIZED	
Work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures: Geo technical surveyors will be required to have radiation awareness training before being allowed on site. An employee with advanced radiation training will clear the areas before GPR work is included.	

12. DAILY SITE SAFETY BRIEFINGS/HAZARD COMMUNICATION (HAZCOM)

- All personnel shall be provided with an initial and daily site safety briefing to communicate the nature, level and degree of hazards expected on site.
 - The daily safety meeting should incorporate but may not be limited to: scope of work; weather conditions; physical, chemical, biological, and radiological hazards; define PPE and doffing/donning procedures and required locations, special precautions (ex. Allergic to bee stings, epi-pen located on the truck, personnel on site and their roles/responsibilities.
- All personnel will also receive briefings when significant changes in site conditions occur and the Health and Safety Plan will be revised accordingly.
- All site personnel will review this HASP.
- SDSs for chemicals brought on site and will be provided as an attachment to the HASP

13. COMMUNICATIONS

- General signals during respirator usage:
 - THUMBS UP – I’m OK/I Agree
 - THUMBS DOWN – I Don’t Agree
 - HANDS ACROSS THROAT – Out of Air/Trouble Breathing
 - GRAB HAND/ARM – Come with Me
 - HANDS ON HEAD – I Need Assistance
- Radio Communications
 - Working – Channel 1
 - Emergency – Channel 2
- Mobile Telephone(s) *(See page 1 and/or attach EPA START phone list)*

14. CONTINGENCIES & EMERGENCY CONTACTS

CONTINGENCIES		
Emergency Contacts and Phone Numbers		
Agency	Contact	Phone Number

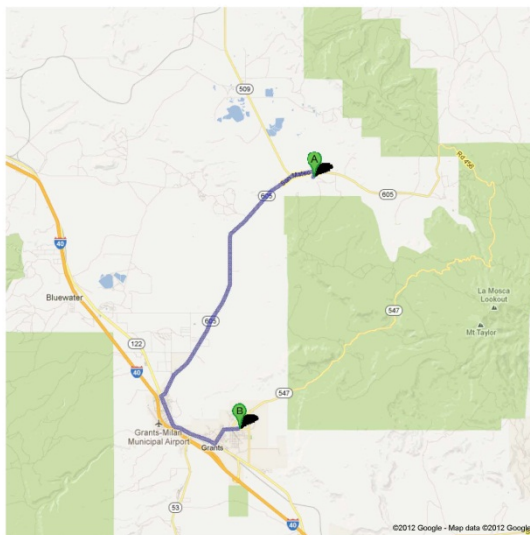
WorkCare WESTON Medical Director WorkCare WESTON Program Administrator	Dr. Peter Greaney Eoin Greany	From 6 am to 4:30 pm Pacific Time call 800-455-6155
After-Business Hours Contact (In Case of Emergency Only)		4:31 p.m. – 5:59 a.m. Pacific Time, all day Saturday, Sunday and Holidays call 800-455-6155 Dial 3 to reach the after- hours answering service. Request that the service connect you with the on- call clinician or the on-call clinician will return your call within 30 minutes.
WESTON Corporate Environmental Health & Safety Director	Herold Hanna	267-516-0274(cell)
WESTON Corporate Health Physicist	Robert Schoenfelder, CHP	505-239-6799(cell)
WESTON EPA Region 6 START Health & Safety Officers	Sam Cheek	972.977.1570 (cell)
Fire Department	Grants FD	505-876-2245
Police Department	Grants PD	505-287-2983
START FSO Cell Phone	Robert Sherman/Sam Cheek Olin Garren	225-573-9785/972-977-1579
START PTL Cell Phone	Robert Sherman/Olin Garren	225-573-9785/865-255-5235
EPA OSC Cell Phone	Warren Zehner Jon Rinehart	214-789-1585(cell) 214-789-1713(cell)
Weston Equipment Store (RES)	Danny Newman	713.301.7702 (cell)
Nearest Telephone	TBD	TBD
Local Medical Emergency Facility(s)		
Name of Hospital: <i>Cibola General Hospital</i>		
Address: <i>1016 East Roosevelt Avenue, Grants, New Mexico</i>		Phone No.: 505-287-4446
Name of Contact: Emergency Room		Phone No.: 505-287-4446

Type of Service:

- ☒ Physical trauma only
- ☐ Chemical exposure only
- ☐ Physical trauma and chemical exposure
- ☒ Available 24 hours

Route to Hospital:

Directions to 1016 Roosevelt Ave, Grants, NM
87020
20.9 mi – about 31 mins

**Travel time from site:**

31 Minutes

Distance to hospital:

21 Miles

**Name/no. of 24-hr
ambulance service:**
911

EPA/WESTON REPRESENTATIVES		
Organization/Branch	Name	Telephone
EPA	Warren Zehner Jon Rinehart	214-789-1585(cell) 214-789-1713(cell)
Weston	David Bordelon, PM	225-297-5403(office)
Weston	Robert Schoenfelder, CHP	505-239-6799(cell)
Weston	PTL Robert Sherman ALT PTL Olin Garren	225-573-9785 865-255-5235
Weston	Larry Howard	225-241-6291 (cell)
Weston	Samuel Cheek, CSP, RRPT	972.977.1570 (cell)
Weston	Keith Delhomme	337-654-4172 (cell)
Weston	Paola Strong	540-430-7377 (cell)
WESTON SUBCONTRACTORS		
Organization/Branch	Name/Title	Telephone
TBD		
OTHER CONTACTS		
Organization/Branch	Name	Telephone
Rio Algom	Doug Murray	505-287-8851 X 11 Office

15. DECONTAMINATION PROCEDURES

- ☒ Wet Decontamination:
- ☒ Soap/water: ☐ Bleach/water:
- ☒ Dry Decontamination

The following decontamination stations should be set up in each decontamination zone:

- Segregated equipment drop
- Disposable glove, bootie, and coverall removal and segregation station
- Safety glasses and hard hat removal station

- Hand and face wash and rinse

If site conditions require upgrade to Level C, a station must be set up for respirator removal, respirator decontamination, and cartridge disposal.

☒ All investigative derived waste (IDW) generated will be placed in appropriate containers, labeled and stored on site for eventual disposal.

☐ Refer to AppendixA for additional Decontamination Procedures.

PPE Reference Web Links

1. MSA Response Respirator Selector - <http://msanet.com/response/chemicalsearch.asp>
2. MSA Cartridge Life Expectancy Calculator - <http://webapps.msanet.com/cartlife/>
3. Scott Respirator Selection - <http://www.scotthealthsafety.com/airpur.htm>
4. Kappler Suit Smart PPE Selector - http://www.kappler.com/techdata_main.html
5. DuPont™ SafeSPEC™ - <http://www2.dupont.com/NOWApp/DPPRequestGateway/>

16. SITE AIR MONITORING PROGRAM

Air Monitoring Instrument						
Instrument Selection and Initial Check Record						
Reporting Format: <input type="checkbox"/> Field Notebook <input type="checkbox"/> Field Data Sheets* <input type="checkbox"/> Air Monitoring Log <input type="checkbox"/> Trip Report <input type="checkbox"/> Other						
Instrument	Task No.(s)	Number Required	Number Received	Checked Upon Receipt	Comment	Initials
<input checked="" type="checkbox"/> RADIATION				<input type="checkbox"/>		
<input checked="" type="checkbox"/> GM (Pancake)	ALL	2		<input type="checkbox"/>		
<input checked="" type="checkbox"/> NaI (Micro R)	ALL	2		<input type="checkbox"/>		
<input type="checkbox"/> ZnS (Alpha Scintillator)				<input type="checkbox"/>		
<input checked="" type="checkbox"/> Other <u>Ludlum 2221 with 44-10 probe</u>	ALL	2		<input type="checkbox"/>		
<input type="checkbox"/> PID				<input type="checkbox"/>		
<input type="checkbox"/> MiniRAE (10.6 lamp)				<input type="checkbox"/>		
<input type="checkbox"/> TVA 1000 (PID/FID)				<input type="checkbox"/>		
<input type="checkbox"/> Other _____				<input type="checkbox"/>		
<input type="checkbox"/> FID						
<input type="checkbox"/> TVA 1000 (FID/PID)				<input type="checkbox"/>		
<input type="checkbox"/> Other				<input type="checkbox"/>		
<input type="checkbox"/> Multiple Sensor Instruments				<input type="checkbox"/>		
<input type="checkbox"/> MultiRAE (LEL/O2/H2S/CO/PID 10.6 lamp)				<input type="checkbox"/>		
<input type="checkbox"/> AreaRAE (LEL/O2/H2S/CO/PID 10.6 lamp)				<input type="checkbox"/>		
<input type="checkbox"/> MultiRAE (LEL/O2/PID 10.6 lamp/ Other: /)				<input type="checkbox"/>		
<input type="checkbox"/> AreaRAE (LEL/O2/PID 10.6 lamp / Other: /)				<input type="checkbox"/>		
<input checked="" type="checkbox"/> Particulate				<input type="checkbox"/>		
<input checked="" type="checkbox"/> PDR-1000	ALL			<input type="checkbox"/>		
<input type="checkbox"/> DataRam				<input type="checkbox"/>		
<input type="checkbox"/> Single Gas Monitor				<input type="checkbox"/>		
Specify Chemical: _____				<input type="checkbox"/>		
<input type="checkbox"/> Personal Sampling Pump				<input type="checkbox"/>		
Specify Media: _____				<input type="checkbox"/>		
<input type="checkbox"/> Colorimetric tubes w/ pump				<input type="checkbox"/>		
Specify (MSA, Dräger, Sensidyne)						
<input type="checkbox"/> Tubes/type: _____				<input type="checkbox"/>		

Action Levels				
	Tasks	Action Level		Action
<input type="checkbox"/> Explosive atmosphere		Ambient Air Concentration	Confined Space Concentration	
		<10% LEL	0 to 1% LEL	Work may continue. Consider toxicity potential.
		10 to 25% LEL	1 to 10% LEL (5% LEL if alternate entry methods are used)	Work may continue. Increase monitoring frequency.
		>25% LEL	>10% LEL (5% LEL if alternate entry methods are used).	Work must stop. Leave the area or if in a confined space evacuate the space. Ventilate and test for acceptable conditions before returning to a confined space. Use initial site assessment air monitoring procedures for return to area in ambient air
<input type="checkbox"/> Oxygen		Ambient Air Concentration	Confined Space Concentration	
		<19.5% O ₂	<19.5% O ₂	Leave area. Re-enter only with self-contained breathing apparatus.
		19.5% to 25% O ₂	19.5% to 23.5% O ₂	Work may continue. Investigate changes from 21%.
		>25% O ₂	>23.5% O ₂	Work must stop. Ventilate area before returning.
<input checked="" type="checkbox"/> Radiation	All	<u>External Exposure :</u> Gamma radiation < 3 times background Gamma radiation measured at 3 times background to < 2 mR/hour		Continue work. Break Areas should be establish in places where gamma radiation exposure rates are as low as possible and removable contamination and airborne radioactivity are not present. Areas with gamma radiation levels greater than three times background levels signifies possible radiation source(s) present and should not be used as break areas.

		<p>> 2 mR/hour</p> <p><u>Airborne Radiation Monitoring:</u></p> <p>In general, worker exposures (occupational) to airborne radioactive particulates will be adequately controlled below the limits provided in 10 CFR 20 Appendix B, Table 2 by ensuring that dust generated during site activities does not reach visible levels for sustained periods of time. This visible dust limit provides adequate worker protection without total particulate monitoring or air particulate sampling as long as gross uranium concentrations in work area soils are not greater than 600 pCi/g. Soil concentrations are assumed to be within this acceptable range as long as gamma radiation readings measured at approximately 1 meter above ground surface in the general work area remain below 400,000 cpm (2x2 NaI detector) or below 5,000 µR/hr (microR meter). Calculations of airborne radiation levels associated with dust generated from soil contaminated at those limits are provided in an attached spreadsheet. Occupational exposures to airborne radioactive particulates will require monitoring of dust in the immediate work area using PDRs if those levels are exceeded.</p> <p>Environmental radionuclide effluent levels will be monitored using Data Rams to ensure that gross dust levels generated by on-site activities will not result in concentrations of airborne radioactive particulates in excess of limits provided in 10 CFR 20 Appendix B, Table 3. Dust levels that are visible to the unaided eye are expected to exceed those limits if soil concentrations are greater than 4 pCi/g. Soil concentrations are assumed to be within this acceptable range as long as gamma radiation readings measured at approximately 1 meter above ground surface in the general work area remain below 4000 cpm (2x2 NaI detector) or below 30 µR/hr (microR meter). A conservative estimate of the measurement sensitivity of the Data Ram for typical dust concentrations under arid conditions is 0.1 mg/m³. Controlling dust generated from on-site activities to 0.1 mg/m³ ensures that the Table 3 limits for Unat and Th-230 will not be exceeded as long as soil concentrations do not exceed approximately 100 pCi/g. Soil concentrations are assumed to be within this acceptable range as long as gamma radiation readings measured at approximately 1 meter above ground surface in the general work area remain below 100,000 cpm (2x2 NaI detector) or below 900 µR/hr (microR meter). Calculations of airborne radiation levels associated with dust generated from soil contaminated at those limits are provided in an attached spreadsheet. Airborne effluent concentrations are determined by monitoring upwind and downwind site boundary locations and determining the difference between the two values.</p>	<p>Only personnel with Advanced radiation training can proceed to work in area greater than 2mR/hr.</p> <p>All personnel will be required to wear personal dosimeters for work in Section 35 and 36.</p> <p>All site visitors will be issued radiation dosimeters when visiting the field sites and be accompanied by the FSO or Alternate FSO. Dosimeter results will be logged in a spreadsheet maintained on site.</p>
		27	

Toxic Substance Action levels = These Action Levels, if not defined by regulation, are some percent (usually 50%) of the applicable PEL/TLV/REL. That number must also be adjusted to account for instrument response factors.

<input type="checkbox"/> Gases and vapors <u>Action Level formula</u> (1/2 PEL / RF)	ALL	Radon gas	avoid enclosed spaces
<input checked="" type="checkbox"/> Solids / Particulate (dust) hazards <u>Action Level Formula</u> (10 ⁶ * PEL) / (Concentration * 2)	All	<p>Airborne dust concentrations are limited based on the Unat and Th-230 concentrations in the work area soils. See airborne concentration limits described in the preceding section of this plan.</p> <p>Particulate concentration should be determined by subtracted the downwind monitoring station from the up wind monitoring station for the work site. Once levels have been established in a work area visible dust may be used at the discretion of the field safety officer.</p> <p>2.5 mg/m³ is the Action level for respirable nuisance dust used by Weston</p>	<p>If dust limits are exceeded then a work stoppage will be instituted until the dust subsides. Employees should take shelter in an upwind area where dust cannot be breathed or engineering controls should be implemented such as wetting of soils.</p>

17. SITE HEALTH AND SAFETY PLAN ACKNOWLEDGEMENT

I understand and agree with the information set forth in this Site Specific Health and Safety Plan and all attachments. I have reviewed the contents of this plan and have had the opportunity to ask additional questions.

Name (Printed)	Signature	Affiliation	Date

Disclaimer: This Health and Safety Plan (HASP) was prepared for work under the Superfund Technical Assessment and Response Team (START) Contract. Use of this HASP by WESTON and its subcontractors is intended to fulfill the OSHA requirements found in 29 CFR 1910.120. Items not specifically covered in this HASP are included by reference to 29 CFR 1910 and 1926.

Appendix A DECONTAMINATION PLAN

(If applicable, include additional decontamination procedures,
e.g. Section 5 from Weston Corporate HASP)Add contents

GENERAL DECONTAMINATION PLAN
Personnel Decontamination
<p>Consistent with the levels of protection required, step-by-step procedures for personnel decontamination for each level of protection are attached.</p>
Levels of Protection Required for Decontamination Personnel
<p>The levels of protection required for personnel assisting with decontamination will be:</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"><input type="checkbox"/> Level B</div> <div style="text-align: center;"><input type="checkbox"/> Level C</div> <div style="text-align: center;"><input checked="" type="checkbox"/> Level D modified</div> </div> <p>Modifications include: nitrile gloves</p>
Disposition of Decontamination Wastes
<p>Provide a description of waste disposition including identification of storage area, hauler, and final disposal site, if applicable</p> <p>Waste generated during sampling activities will be placed into contractor grade garbage bags and disposed in municipal waste receptacles.</p>
Equipment Decontamination
<p>A procedure for decontamination steps required for non-sampling equipment and heavy machinery follows: Equipment will be screened with a GM pancake probe to ensure radiological contamination is not leaving site. A background reading for the GM pancake should be determined before entering locations to be able to determine if radiological contamination exists.</p>
Sampling Equipment Decontamination
<p>Sampling equipment will be decontaminated in accordance with the following procedure: Wet decontamination will be conducted on non-disposable equipment and disposable sampling equipment will be used whenever possible. Wet decon will consist of washing the equipment with Liquinox and water and doing a double rinse.</p>

Appendix B
HAZCOM Program

HAZARD COMMUNICATION PROGRAM



**Corporate Headquarters
1400 Weston Way
PO Box 2653
West Chester, PA 19380**

September 2014

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LIST OF ACRONYMS

APP	Accident Prevention Plan
CEHS	Corporate Environmental Health and Safety
CFR	Code of Federal Regulations
EHS	Environmental Health and Safety
GHS	Globally Harmonized System of Classification and Labelling of Chemicals
HASP	Health and Safety Plan
HAZCOM	Hazardous Communication Standard
HAZWOPER	Hazardous Waste and Emergency Response
HCP	Hazard Communication Programs
HMIS	Hazardous Material Identification System
IHC	Initial Hazard Communication
NFPA	National Fire Protection Association
OSHA	Occupational Safety and Health Administration
SDS	Safety Data Sheets
SP	Safety Plan
SPA	Safety Plan Amendment
TRA	Task Risk Assessment
WESTON	Weston Solutions

PURPOSE

The purpose of OSHA's Hazardous Communication Standard (HAZCOM) is to ensure that the hazards of all chemicals produced or imported are properly classified, and that information concerning the classified hazards is transmitted to employers and employees. The requirements of OSHA's HAZCOM Standard are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Revision 3. The transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets and employee training. By implementing Weston's HAZCOM Program, WESTON is committed to ensure that all employees have the "right to know" the properties and associated hazards of the chemicals they work with, or to which they are potentially exposed. This knowledge will reduce the potential for incidence of chemical-related occupational illness or injury, and will provide an overall safer working environment. This written program is available online (on the WESTON EHS Portal) to employees and other affected individuals and will be provided in hard copy or electronic media upon request.

Hazardous materials covered by this program are those referenced in 29 CFR 1910.1200 and in 29 CFR 1926.59. Unless exempted from coverage by these standards, and/or as discussed within the context of this program, all hazardous chemicals in use at a site or facility and any hazardous chemical created by work activities conducted by WESTON (or by others which creates an exposure to WESTON personnel) must meet the requirements of the standard and of WESTON's written program. WESTON is not normally a manufacturer, importer, or distributor of hazardous materials. Therefore, this program is intended to address the regulatory requirements that apply to employers and the employee's right to know only. For purposes of the standard and of this program, exposure is defined to include any route of entry (inhalation, ingestion, injection or absorption) and also includes potential (i.e., accidental or possible) exposure, including foreseeable emergencies. Foreseeable emergencies include, but are not limited to, employee exposures that may result from equipment failure, container rupture, or failure of control equipment that could cause an uncontrolled release of a hazardous chemical.

Beginning December 2013, Weston implemented the provisions of the Global Harmonization System and initiated employee training, the use of safety data sheets (SDS), and revised container labelling requirements. The GHS training has also become a new employee training requirement and a required component of each site-specific Health and Safety Plan (HASP) or Accident Prevention Plan (APP).

Work Controls TO PREVENT Injuries and Illness

Weston-specific field operating procedures provide direction to all employees for conducting work safely while controlling the potential for employee injuries and illness. The associated site-specific document(s) also reiterate the employee right and responsibility to report unsafe conditions and to interrupt or stop work without fear of reprisal.

All WESTON projects are required to maintain a written site-specific hazard communication program that includes the chemical storage location, a system to maintain chemical inventories, and the location of chemical-specific SDS.

RESPONSIBILITY

Managers responsible for each facility, project, or site are responsible for:

1. Ensuring that labels are placed where required,
2. Comparing SDSs and other information with label information to ensure correctness,
3. Proper storage, and
4. Maintaining the inventory of hazardous substances.

All employees are responsible for ensuring and maintaining compliance with this program. Any questions or concerns should be directed to site or location management or the responsible safety officer.

EMPLOYEES AFFECTED

This program applies to all WESTON employees and other individuals who may encounter a hazardous chemical in a WESTON work area. WESTON's work activities cover a wide range of tasks that may involve hazardous materials from common household cleaners and office supplies to chemical reagents. The following categories of workers are identified to appropriately indicate how this program will apply to them.

FIELD WORKERS

Employees at field sites may encounter known, manufactured hazardous materials such as chemical reagents, as well as uncontrolled hazardous wastes that are not clearly identified or defined. This program will be strictly implemented for the former, and applied as appropriate and practical for the latter.

Before assignment to hazardous field operations, personnel are required to successfully complete a 40-Hour Hazardous Waste and Emergency Response (HAZWOPER) Training Course (or equivalent) that includes instruction in physical, biological, radiological, and toxic hazards of chemicals that are likely to be encountered in their work assignments. This required training program is intended to minimize the risks associated with activities involving potential exposure to the uncontrolled hazardous wastes.

In addition, site-specific HASPs are developed prior to initiating work activities to evaluate and document site hazards. The HASPs is a tool for acquiring and distributing information that would normally be provided in SDSs and labeling on containers for manufactured substances. Regular safety meetings are scheduled to review or amend the HASP, and to provide employees with training on non-routine work assignments involving hazardous materials.

NON-FIELD WORKERS WORKING WITH HAZARDOUS MATERIALS

WESTON recognizes that personnel other than field personnel require Hazard Communication Training (e.g., laboratory, mail room, maintenance, graphics, office, and print shop employees). Training of these employees is accomplished during the new employee orientation and training process, annually or by attending function-specific training courses. Non-field activities will comply fully with requirements for SDSs and container labeling and storage provisions.

MULTI-EMPLOYEE WORKSITES

WESTON subcontractors, clients and client subcontractors whose employees could come in contact with WESTON controlled hazardous chemicals on any WESTON project site or location must be formally notified of the presence of those hazardous substances and provided with access to the associated SDS. Other employers, clients, or contractors whose employees could be exposed to hazardous chemicals used or stored by WESTON will be informed of the hazardous chemicals, the labeling system in use, and the location of SDSs for the hazardous substances. Also, other parties or contractors using or storing hazardous chemicals to which WESTON employees could be exposed will be required to provide Weston employees with similar information and access to their SDSs.

All subcontractors must implement a location specific Hazard Communication Program at each work site. They must also inform WESTON's site manager of any hazardous chemicals used in their work for WESTON, must have appropriate SDSs on site, and must have containers correctly labeled.

Site Managers and Client Service Managers are responsible for ensuring that clients provide hazard communication information to Weston management, where exposure to hazardous substances are subject to HAZCOM Standard.

LABELING REQUIREMENTS

All containers of hazardous chemicals subject to the HAZCOM Standard must be labeled with the chemical name (as cross-referenced with the SDS listing) and appropriate hazard warnings (signal word, precautionary statement, hazard statement, and pictogram). Labels must be legible and prominently displayed.

The use of standard formats such as the Hazardous Material Identification System (HMIS) or the National Fire Protection Association (NFPA) 704M system may be used until June 2016, after which the Global Harmonization System for labelling hazardous chemicals must be used. Information relative to the system use and definitions must be displayed in a central work location accessible to all employees. Additionally, affected personnel must receive training in the use of the system and in specific workplace chemical hazards (such as harmful effects and target organ effects).

In accordance with the GHS, container labels must include:

- Product identifier
- Signal words
- Hazard statements
- Pictograms (Attachment C)
- Precautionary statements
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Workplace containers of hazardous chemicals filled from other containers (for repeated secondary use) must be labeled, tagged, or marked to indicate the identity of the hazardous chemical and the appropriate hazard warnings. Labels are not required on single-use portable containers filled from a correctly labeled container if the following conditions are met: 1) only the worker filling the container uses the material from that container, and 2) the material is used immediately (before the end of the day). Labels must remain on containers and must remain legible until the contents no longer create a hazard. Piping systems designed or routinely used by WESTON personnel are not considered to be containers for the purpose of this program. However, piping systems will be labeled to indicate the materials inside them for safety reasons, as appropriate.

SAFETY DATA SHEETS

To inform workers of the nature of hazardous chemicals that may be encountered on the job (including hazardous constituents or substances that may be inclusive to waste streams), WESTON provides training and safe handling procedures for these chemicals and maintains SDSs at each site for the hazardous chemicals at that site. Current WESTON employees, who are potentially exposed to hazardous chemicals, received GHS training in accordance with the published required timeline by December 2013. New employees hired after December 2013 receive GHS training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information is made available through labels and safety data sheets. Each SDS contains important information about a hazardous chemical that workers may encounter, including:

- Product identity
- Hazardous ingredients
- Physical and chemical characteristics
- Fire and explosive hazard data
- Reactivity data
- Health and Physical hazard data (Attachment B)
- Precautions for safe handling and use
- Employee protection and control measures
- Special precautions
- First aid/medical directions

Each SDS contains important information about a hazardous chemical that workers may encounter:

Section 1: Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2: Hazard(s) identification includes all hazards regarding the chemical and required label elements.

Section 3: Composition/information on ingredients includes information on chemical ingredients and trade secret claims.

Section 4: First-aid measures includes important symptoms/effects, exposure timeframes (acute or delayed), and required treatment.

Section 5: Fire-fighting measures lists suitable extinguishing techniques and necessary equipment, as well as chemical hazards which could result from fire.

Section 6: Accidental release measures lists emergency procedures, protective equipment, and proper methods of containment and cleanup.

Section 7: Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8: Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs), NIOSH Threshold Limit Values (TLVs), appropriate engineering controls, and recommended personal protective equipment (PPE).

Section 9: Physical and chemical properties lists the chemical's characteristics.

Section 10: Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11: Toxicological information includes routes of exposure, related symptoms, acute and chronic effects, as well as numerical measures of toxicity.

Section 12: Ecological information provides potential risk to the environment in the event of a release. This information was not included in previous Material Safety Data Sheets (SDSs) as part of OSHA's Hazard Communication Standard prior to adoption of GHS.

Section 13: Disposal considerations provides recommendations for safe product containerization and disposal. This information was not included in previous SDSs as part of OSHA's prior Hazard Communication Standard prior to adoption of GHS.

Section 14: Transport information provides information related to transport of the material in accordance with US Department of Transportation requirements. This information was not included in previous SDSs as part of OSHA's prior Hazard Communication Standard prior to adoption of GHS.

Section 15: Regulatory information lists pertinent safety, health and environmental regulations specific to the chemical. This information was not included in previous SDSs as part of OSHA's prior Hazard Communication Standard prior to adoption of GHS.

Section 16: Other information includes the date of preparation or last revision.

The SDSs must be kept in an accessible place at the site, and site workers should know where they are located at all times. In addition to maintaining SDSs in a central location at each site, they should be posted near the area in which hazardous chemicals are being handled for quick and easy reference while the work is being conducted.

An employee who routinely orders and uses chemicals or hazardous substances is required to request an SDS from the supplier or manufacturer if one is not supplied with the item. A record of requests for SDSs must be maintained and may be documented simply by an entry in the site logbook.

SDSs must be kept up-to-date. Upon receipt of new SDS materials, the old forms will be replaced with the new information. If a review of the updated SDS indicates new hazard information (e.g., recent evaluation as a carcinogen), this information must be transmitted to all affected personnel.

INVENTORY/LISTING

A listing of hazardous substances must be kept in each location, office or site where hazardous materials are stored or used. The list must be kept up to date as chemicals are added, used, or deleted from the inventory.

The list of hazardous chemicals must be attached at the front of the SDS file. For operations that have a site-specific HASP/APP, the completed chemical hazard page of the HASP/APP, with a reference to the SDSs on-site and their location, will serve as the hazardous chemical list. The hazardous chemical list must use identities that are referenced on the appropriate SDSs.

The SDS list must be maintained in an acceptable manner, for example as part of the HASP that is maintained onsite; in a notebook maintained onsite; or within a computer system with site access. Affected employees must have access to these materials during the course of their work shifts. If computerized data are utilized, all affected personnel must know how to use the computer equipment in order to gain access to the needed information.

Safety plans for field site operations serve the purpose of hazard communication for contaminants present. Copies of the HASP must be available on field sites, must be identified at formal briefings or site safety meetings prior to field activity commencement, and must be available for review by site personnel. Typically, site personnel are required to review the HASP prior to commencing work at the site.

TRAINING

Information and training will be provided to employees regarding the chemical hazards in their work areas, including by-products and hazardous chemicals introduced by another employer. This training is necessary when those chemicals are known to be present in such a manner that WESTON employees may be exposed under normal conditions of use or in a foreseeable emergency. Attendance at training courses will be recorded and documented.

Initial Hazard Communication (IHC) training will be conducted as a stand-alone course or in combination with other WESTON training programs such as those conducted under 29 CFR 1926.21, 29 CFR 1910.120, and 29CFR1910.1200.

Training will be repeated for workers at a site whenever it is evident that personnel are not aware of the requirements of the HAZCOM Program, new chemicals are introduced into the work area, or the procedures established to comply with this written program are revised. For field personnel at hazardous waste sites, refresher training is provided as a natural progression of the annual training requirements under 29 CFR 1910.120. Prior to beginning use of a new hazardous chemical that is not commonly used and that may result in serious health impacts upon exposure, the supervisors will review SDS and label information with employees who will be using the substance. Prior to beginning a new or non-routine task involving use of chemicals, a Safety Plan (SP), Safety Plan Amendment (SPA), or Task Risk Assessment (TRA) will be completed identifying the hazards of the substance, how the task will affect risk of exposure and any changes in protective measures, equipment or procedures.

LOCATION-SPECIFIC PROGRAMS

Location-specific Hazard Communication Programs (HCP) will be developed for each WESTON Office or work location where employees have potential exposure (as defined in the standard) to hazardous chemicals. Each location-specific HCP will comply with the requirements of this document. A model for the location-specific HCP is provided on the WESTON CEHS Portal.

ATTACHMENT A
MODEL LOCATION-SPECIFIC HAZARD COMMUNICATION PROGRAM

ATTACHMENT A

MODEL LOCATION-SPECIFIC HAZARD COMMUNICATION PROGRAM

Attachment A will be completed once the field team arrives on-site

This document (or similar document) is used in conjunction with WESTON's written Hazard Communication Program as a means of meeting site or location specific requirements and to ensure compliance with the Hazard Communications/Standard. Each employee is responsible for the proper implementation of this written HAZCOM program.

To ensure that information about the dangers of all hazardous chemicals used by WESTON is known by all affected employees, the following location specific HAZCOM program has been established. All affected personnel will participate in the Hazard Communication Program. This location-specific program and the written Hazard Communication Program will be available for review by any employee, employee representative, and representative of OSHA, NIOSH or any affected employer/employee on a multi-employer site.

List of Hazardous Chemicals

A list of known hazardous chemicals used by WESTON personnel must be prepared and attached to this document or located in a centrally identified location with the SDSs. Further information on each chemical may be obtained by reviewing the appropriate SDSs. The list will be arranged to enable cross-reference with the SDS file and the label on the container. The location manager and safety officer are responsible for ensuring the chemical listing remains up-to-date. An example of the list is available at the end of this document.

Container Labeling

Employees will verify that all containers received from the chemical manufacturer, importer or distributor for use on site will be clearly labeled. The employee is responsible for assuring labels are placed where required and for comparing SDSs and other information with label information to ensure correctness.

Safety Data Sheets (SDSs)

The location manager and safety officer are responsible for establishing and monitoring WESTON's HAZCOM program that includes SDS in accordance with the Global Harmonization System. Procedures will be developed to obtain the necessary SDSs and will require employees to review SDS's for physical and health hazard information. He/she will see that any new information is passed on to the affected employees. If an SDS is not received at the time of initial shipment, the employee will call the manufacturer and have an SDS delivered for that product in accordance with the requirements of WESTON's written Hazard Communication Program. A list of all hazardous chemicals in use will be kept in the SDS folder and the folder will be kept at a central location known to all site workers. SDSs will be readily available to all employees during each work shift.

ATTACHMENT A

MODEL LOCATION-SPECIFIC HAZARD COMMUNICATION PROGRAM

Attachment A will be completed once the field team arrives on-site

Employee Training and Information

The location manager and safety officer will ensure that all program elements specified below are supplied to all affected employees. At the time of initial assignment for employees to the work site or whenever a new hazard is introduced into the work area, employees will attend a health and safety meeting or briefing that includes the information indicated below:

- Hazardous chemicals present at the work site
- Physical and health risks of the hazardous chemicals
- The signs and symptoms of overexposure
- Procedures to follow if employees are overexposed to hazardous chemicals
- Location of the SDS file and written hazard communication program
- How to determine the presence or release of hazardous chemicals in the employees work area
- How to read labels and review SDSs to obtain hazard information
- Controls WESTON has implemented to reduce or prevent exposure to hazardous chemicals
- How to reduce or prevent exposure to hazardous chemicals through use of controls, procedures, work practices and personal protective equipment
- Hazardous, non-routine tasks to be performed (if any)
- Chemicals within unlabeled piping (if any)

Hazardous Non-Routine Tasks

When employees are required to perform hazardous non-routine tasks, the affected employee(s) will be given information by the supervisor about the hazardous chemicals he or she may be exposed to during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use and steps WESTON is using to reduce the hazards. These steps include, but are not limited to, ventilation, respirators, minimum staff requirements, and emergency procedures.

Chemicals in Unlabeled Pipes

Work activities may be performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the supervisor at which time information will be provided as to the chemical(s) in the pipes, potential hazards of the chemicals or the process involved, and safety precautions, which should be taken.

ATTACHMENT A

MODEL LOCATION-SPECIFIC HAZARD COMMUNICATION PROGRAM

Attachment A will be completed once the field team arrives on-site

Multi-Employer Worksites

It is the responsibility of the location manager and safety officer to provide other employers with information about hazardous chemicals imported by WESTON to which their employees may be exposed, along with suggested safety precautions. It is also the responsibility of each manager to obtain information about hazardous chemicals used by other employers to which WESTON employees may be exposed. WESTON's chemical list will be made available to other employers as requested. SDSs will be available for viewing as necessary.

The location, format and procedures for accessing SDS information must be relayed to affected employees.

Site/Project/Location Manager: _____

Site or other location name/address: _____

Site/Project/Location Manager: _____

Site/Location Safety Officer: _____

Format for List of Chemicals: HASP: _____ Other: _____

Location of SDS Files: _____

Training Conducted by (name and date): _____

Indicate format of training documentation: Field Log: _____ Other: _____

Date of client briefing regarding hazard communication: _____

If multi-employer site, indicate name of affected companies: _____

Dates other employer(s) notified of chemicals, labeling and SDS information:

Dates WESTON notified of other employers' or clients' hazard communication program:

ATTACHMENT A

MODEL LOCATION-SPECIFIC HAZARD COMMUNICATION PROGRAM

Attachment A will be completed once the field team arrives on-site

SITE HAZARDOUS CHEMICAL LIST

[illegible]

ATTACHMENT B
HEALTH AND PHYSICAL HAZARD CLASSIFICATION

ATTACHMENT B

HEALTH AND PHYSICAL HAZARD CLASSIFICATION

Under the new HAZCOM standard, a hazardous chemical is defined as a chemical that meets the definition of a health hazard class (see Appendix A of 29 CFR 1910.1200; a physical hazard class (see [Appendix B of 29 CFR 1910.1200](#)); or it is a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified (see the definitions for these terms at [29 CFR 1910.1200\(c\)](#)). The majority of the health and physical hazard classes also include category classifications within each specified class. The hazard classification process should include the following steps:

- Identify the relevant data regarding the hazards of the chemical
- Review the data to ascertain the hazards associated with the chemical
- Determine if the chemical is hazardous based on its physical, health, and other hazards
- Identify each of the hazard classes that apply to each chemical
- Where appropriate, identify the appropriate hazard category within each class for the chemical you are classifying. The hazard categories are divisions within each hazard class which identify the severity within the hazard class.

There are 10 health hazard classes, each of which is divided into categories at [29 CFR 1910.1200 Appendix A-Health Hazard Criteria](#), which include:

1. Acute Toxicity, Categories 1-4 (with 1 being the most dangerous, 4 the least dangerous)
2. Skin Corrosion/Irritation, Categories 1A, 1B, 1C, and 2
3. Serious Eye Damage/Eye Irritation, Categories 1, 2A, and 2B
4. Respiratory or Skin Sensitization, Category 1A and 1B
5. Germ Cell Mutagenicity, Categories 1A, 1B, and 2
6. Carcinogenicity, Categories 1A, 1B, and 2
7. Reproductive Toxicity, Categories 1A, 1B, 2, and additional category for effects on or via lactation
8. Specific Target Organ Toxicity - Single Exposure (STOT-SE), Categories 1-3
9. Specific Target Organ Toxicity - Repeated or Prolonged Exposure (STOT-RE), Categories 1 and 2
10. Aspiration Hazard, Category 1

There are 16 physical hazard classes and their associated hazard categories, which are defined in [29 CFR 1910.1200, Appendix B-Physical Hazard Criteria](#), and include:

1. Explosives, Divisions 1.1-1.6 (with 1.1 being the most hazardous, 1.6 the least hazardous)
2. Flammable Gases, Categories 1 and 2
3. Flammable Aerosols, Categories 1 and 2
4. Oxidizing Gases, Category 1
5. Gases Under Pressure, 4 Groups include: Compressed gas, Liquefied gas, Dissolved gas, and Refrigerated liquefied gas
6. Flammable Liquids, Categories 1-4
7. Flammable Solids, Categories 1 and 2
8. Self-Reactive Chemicals, Types A-G
9. Pyrophoric Liquids, Category 1
10. Pyrophoric Solids, Category 1
11. Self-Heating Chemicals, Categories 1 and 2
12. Chemicals Which, in Contact with Water, Emit Flammable Gases, Categories 1-3










ATTACHMENT B

HEALTH AND PHYSICAL HAZARD CLASSIFICATION

- 13. Oxidizing Liquids, Categories 1-3
- 14. Oxidizing Solids, Categories 1-3
- 15. Organic Peroxides, Types A-G
- 16. Corrosive to Metals, Category 1

ATTACHMENT C
HAZARD COMMUNICATION STANDARD PICTOGRAM

Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards		
<p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/ Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)

Appendix C
Air Monitoring Logs and Calibration Records

Date: ____/____/____

Collected by: _____

Please specify where air monitoring data will be documented: ☐ Field Notebook ☐ Field Data Sheets

☐ Air Monitoring Log ☐ Trip Report ☐ Other _____

Station Location	Multi-RAE	Micro FID	Radiation Meter	DataRAM or PDR	Lumex MVA	Other	Other
Background Readings	____%LEL ____%O ₂ ____ppm CO ____ppm H ₂ S ____ppm VOC	____ppm	____μR/hr ____mR/hr ____CPM	____μg/m ³ or ____mg/m ³	____ng/m ³		
	____%LEL ____%O ₂ ____ppm CO ____ppm H ₂ S ____ppm VOC	____ppm	____μR/hr ____mR/hr ____CPM	____μg/m ³ or ____mg/m ³	____ng/m ³		
	____%LEL ____%O ₂ ____ppm CO ____ppm H ₂ S ____ppm VOC	____ppm	____μR/hr ____mR/hr ____CPM	____μg/m ³ or ____mg/m ³	____ng/m ³		
	____%LEL ____%O ₂ ____ppm CO ____ppm H ₂ S ____ppm VOC	____ppm	____μR/hr ____mR/hr ____CPM	____μg/m ³ or ____mg/m ³	____ng/m ³		
	____%LEL ____%O ₂ ____ppm CO ____ppm H ₂ S ____ppm VOC	____ppm	____μR/hr ____mR/hr ____CPM	____μg/m ³ or ____mg/m ³	____ng/m ³		

[illegible]

Appendix D
BBS Field Review Form

Site Name: _____ WO #: _____

Location: _____ Date: _____ Field Activities Began: _____

Name of Designated, Qualified Field Safety Officer On-Site: _____

DESCRIPTION OF FIELD ACTIVITIES: Check one

- ☐ Drilling/Soil Sampling ☐ Groundwater Sampling ☐ Air Sampling ☐ IH Sampling
☐ Test Pits/Trenching ☐ UST Removal ☐ Remediation ☐ Vertical Construction
☐ Demolition ☐ Fuels ☐ MEC\UXO\DMM ☐ Recon
☐ Other: _____

BEHAVIOR-BASED SAFETY (BBS) PROGRAM ELEMENTS

Item No.	Yes	No	Element	
1			All WESTON personnel on-site have received BBS orientation.	
2			Weston's "Safety Vision" has been communicated to all project team members.	
3a			Project has SMART safety goals. <input type="checkbox"/> Field activities <input type="checkbox"/> Vehicle safety <input type="checkbox"/> Other	If yes, list:
3b			SMART goals are documented and communicated to field team, including contractors.	
4			The client has a BBS program to which Weston must adhere.	
5			Baseline safety data exists for the scheduled work tasks/activities.	
6			Targeted behaviors are identified for observation during the field audit.	If yes, list:
7			Health and Safety Plan (HASP) posted on-site and orientation given to each person.	
8			Initial HASP meeting held and documented before work began.	
9			Daily EHS briefings identify the day's tasks and related potential unsafe behaviors.	
10			Daily EHS briefings are interactive.	
11			Daily EHS Meetings are conducted by: <input type="checkbox"/> SM <input type="checkbox"/> FSO <input type="checkbox"/> Other (Identify): _____	
12			Site personnel are provided with additional training or support to complete tasks safely.	
13			Question and answer time is available to all site personnel.	
14			A formal observation program is in place (client-specific). Observations are documented. If yes, observations are performed by: _____	
15			An informal observation program is in place. Observations are documented. If yes, observations are performed by: _____ Type: <input type="checkbox"/> Targeted behavior checklist – corporate <input type="checkbox"/> Site-specific <input type="checkbox"/> Observed actively caring behaviors	
16			Feedback mechanisms are in place.	If yes, identify mechanisms:

Item No.	Yes	No	Element
17			The field team leader or designee recognizes and corrects unsafe behaviors in the field.
18			The field team leader shows commitment to the Actively Caring concept and encouragement of Actively Caring behaviors among team members.
19a			The Short Service Employee (SSE) Policy is followed for anyone with Weston for 6 months or less or in current position for 6 months or less.
19b			A mentor is assigned to the SSE.
19c			The SSE is designated through use of: _____ (e.g., specific colored hat, badge/sticker)
19d			Site team consists of minimum number of SSEs.
Comments/Additional Information – Best Practices Observed:			

CERTIFICATION OF PERSONNEL

Item No.	Yes	No	Element		
1a			Site is subject to HAZWOPER Regulations		
1b			If yes, all personnel on-site have current HAZWOPER training.		
1c			If (1a) is yes, all personnel on-site have current HAZWOPER medical.		
2			Site requires respirator use. If yes, all personnel on site are: <input type="checkbox"/> medically qualified for respirator use <input type="checkbox"/> trained for respirator use <input type="checkbox"/> fit-tested for respirators to be used		
3a			Site/client requires other standard specific medical certification. If yes, specify requirement(s):		
3b			Site/client requires substance-specific medical. If yes, list substance(s):		
3c			Site/client requires drug and alcohol testing.		
3d			Physical capability medical required. If yes, indicate type: <input type="checkbox"/> General physical capability <input type="checkbox"/> Equipment/vehicle operation <input type="checkbox"/> Other: _____		
4			Site requires special supervisor training and/or certification. If yes, check requirement: <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> HAZWOPER supervisor training <input type="checkbox"/> Construction 30 hour course <input type="checkbox"/> Construction site manager's safety course </td> <td style="vertical-align: top;"> <input type="checkbox"/> Asbestos abatement <input type="checkbox"/> Lead Abatement <input type="checkbox"/> Competent person. List type(s): <input type="checkbox"/> Qualified person. List type(s): </td> </tr> </table>	<input type="checkbox"/> HAZWOPER supervisor training <input type="checkbox"/> Construction 30 hour course <input type="checkbox"/> Construction site manager's safety course	<input type="checkbox"/> Asbestos abatement <input type="checkbox"/> Lead Abatement <input type="checkbox"/> Competent person. List type(s): <input type="checkbox"/> Qualified person. List type(s):
<input type="checkbox"/> HAZWOPER supervisor training <input type="checkbox"/> Construction 30 hour course <input type="checkbox"/> Construction site manager's safety course	<input type="checkbox"/> Asbestos abatement <input type="checkbox"/> Lead Abatement <input type="checkbox"/> Competent person. List type(s): <input type="checkbox"/> Qualified person. List type(s):				
Comments/Additional Information:					

MEDICAL AND FIRST AID

Item No.	Yes	No	Element
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1			First-aid kits accessible and identified.
2			Emergency eye/safety washes available. <input type="checkbox"/> ANSI compliance required.
3			First-aid kits and eyewash capabilities inspected weekly and documented (for site projects greater than 1 week in duration).
4			At least two first-aid/CPR-trained persons are on-site at all times when working.
Comments/Additional Information:			

EMERGENCY ACTION PLANS

Item No.	Yes	No	Element
1			Emergency Action Plan (EAP) posted on-site.
2			EAP orientation provided.
3			Emergency telephone numbers posted.
4			Emergency routes posted. <input type="checkbox"/> Map <input type="checkbox"/> Written Directions.
5			Emergency plan and signals reviewed with all persons.
Comments/Additional Information:			

HAZARD COMMUNICATION

Item No.	Yes	No	Element
1			A site-specific HAZCOM Plan is in effect and up to date.
2			A chemical inventory and SDSs are available. Where?
3			Employees trained in the HAZCOM Plan and chemical hazards.
4			100% compliance with HAZCOM observed.
5			Coaching on HAZCOM observed.
Comments/Additional Information:			

PERSONAL PROTECTION

Item No.	Yes	No	Element
1			PPE Plan has been verified by a Qualified person.
2			All PPE meets applicable ANSI/OSHA/EPA criteria.
3			Hard hat, eye, hearing, foot and other PPE areas are defined and signs in place.
4			Levels of protection (LOP) are established.
5			Site control zones (Exclusion, CRZ, Support) are indicated clearly.
6			All employees know their LOP scheme.
7			OSHA respirator program in place.
8			Employees fit tested: <input type="checkbox"/> QLFT <input type="checkbox"/> QNFT <input type="checkbox"/> On-site <input type="checkbox"/> Current
9			PPE inspected and checked before use.

Item No.	Yes	No	Element
10			PPE stored properly.
11			Defective equipment tagged out.
12			Sufficient quantities of equipment available.
13			Monitoring Instruments Plan in place and communicated.
14			Instruments maintained and calibrated.
15			Maintenance & Calibration logs up to date.
16			Flotation devices worn when working on or over water.
17			PPE use 100% safe.
18			PPE coaching observed.
Comments/Additional Information:			

DECONTAMINATION

Item No.	Yes	No	Element
1			Decontamination system set up on-site.
2			Decontamination system used according to safety plan.
3			Contamination reduction corridor clearly delineated in the CRZ.
4			Appropriate waste receptacles available for all waste.
5			Receptacles properly closed at end of day.
6			All decon liquids properly contained and disposed.
7			All wastes disposed of according to approved plan.
8			All personnel received decontamination training.
9			All reusable personal protective gear deconned and disinfected at least daily.
10			Decontamination process 100% followed.
11			Decontamination coaching observed.
Comments/Additional Information:			

HIGHWAY VEHICLE DRIVING

Item No.	Yes	No	Element
1			Highway vehicle driving addressed in HASP.
2			Highway vehicle driving regularly addressed in safety meetings.
3			Fatigue Management policy discussed with all site workers.
4			Hands-free cell phone use only.
5			All cell phone/radio use limited while driving.
6			100% safe driving observed.
7			Safe driving coaching observed.
8			Journey Management Plan in place.

Item No.	Yes	No	Element
Comments/Additional Information:			

WORKING AT ELEVATION

Item No.	Yes	No	Element
1			Ladders are used 100% safely.
2			Ladders used are appropriate for work performed.
3			Portable ladders are inspected before use.
4			Portable ladders are secured from falling.
5			Fixed ladders are inspected for structural integrity.
6			Coaching on ladder use observed.
7			Scaffolds are set up and dismantled under supervision of a competent person.
8			Scaffolding is inspected daily.
9			Scaffold inspections are documented.
10			All site personnel are trained to use scaffolding safely.
11			Scaffolding is used 100% safely.
12			Coaching on safe scaffold use observed.
13			Only qualified persons operate aerial or scissor lifts.
14			Personnel working at elevation in aerial or scissor lifts are protected from falling by fall limiting or arrest systems as required by regulation or manufacturers.
15			Aerial or scissor lifts are moved while workers are elevated only if permitted by manufacturers.
16			Travel routes for aerial or scissor lifts are inspected for impediments prior to moving.
17			Aerial and scissor lifts are inspected prior to each shift.
18			Aerial and scissor lifts are used 100% safely.
19			Coaching in safe use of aerial and scissor lifts observed.
20			The hierarchy of controls (elimination, substitution, engineering, administrative) is considered prior to performing work at elevation where reliance is placed on fall limiting or fall arresting system.
21			Fall prevention plans are developed by a competent person.
22			Horizontal lifelines are installed by qualified persons.
23			Fall prevention plans include plans for rescue.
24			Fall limiting and arrest equipment is inspected prior to use.
25			Fall limiting and arrest equipment is worn properly.
26			Anchor points are designed and used properly.
27			100% safe use of fall arrest and limiting systems.
28			Coaching is observed on use of fall arrest and limiting systems.
Comments/Additional Information:			

STRUCK-BY HAZARDS

Item No.	Yes	No	Element
1			Struck-by hazards are identified and addressed in the HASP.
2			Struck-by hazards are addressed in daily safety meetings.
3			High visibility vests are worn by all personnel working in areas where moving equipment is in use and along roadways.
4			A written Traffic Control Plan is implemented.
5			Operators and pedestrians are trained to gain eye contact before crossing vehicle travel ways.
6			Vehicles with blind spots are equipped with backup or motion alarms.
7			Qualified spotters are provided for vehicle backing in congested areas.
8			Qualified flaggers are provided where vehicle traffic enters or crosses public roadways.
9			Signs meeting requirements of the MUTCD are used to alert roadway users impacted by vehicles entering, crossing or leaving public roadways.
10			Site speed limits are posted and followed.
11			Traffic routes are established and followed in congested areas.
12			100% safe operation is observed.
13			Coaching for traffic safety is observed.
14			Materials which can fall from above or be blown are secured.
15			Exclusion zones are established around operations which can expel material or objects at velocity.
16			Personnel are not permitted under loads.
17			Personnel are not permitted to cross under conveyors unless guarding is provided.
18			Taglines are used for positioning elevated loads.
19			Lifting equipment operators know not to fly loads over site personnel.
20			Exclusion zones are established around masonry walls under construction or being demolished.
21			Preformed walls or lift slab concrete is secured during placement.
22			Power tools designed to accommodate guards are equipped with functional guards.
23			When work is being performed overhead, tools not in use are secured or placed in holders.
24			The use of cranks on hand-powered winches or hoists is prohibited unless the hoists or winches are provided with positive self-locking dogs.
25			Hand wheels with exposed spokes, projecting pins, or knobs are not used.
26			Abrasive wheels are provided with safety guards.
27			Abrasive wheels for chop saws are chosen based on material to be cut.
28			Safety clips or retainers are installed and maintained on pneumatic impact tools to prevent dies and tools from being accidentally expelled from the barrel.
29			Safety lashings are provided at connections between tool and hose and at all quick makeup type connections.
30			Only qualified persons operate explosive-actuated tools.
31			Chain saws, torches or other power tools are not used to cut above shoulder height.
32			Powered nailers have a safety device on the muzzle to prevent the tool from ejecting fasteners unless the muzzle is in contact with the work surface.

Item No.	Yes	No	Element
33			Contact trip devices or triggers are not secured in an "on" position.
34			Workers using tools are positioned so work of one does not adversely affect others.
35			100% safe use of tools observed.
36			Coaching on tool use observed.
Comments/Additional Information:			

CAUGHT -IN HAZARDS

Item No.	Yes	No	Element
1			Caught-in hazards are identified and addressed in the HASP.
2			Caught-in hazards are addressed in daily safety meetings.
3			Pinch point, power drives, belts, etc. are guarded.
4			Lockout-tagout (LOTO) used when performing maintenance.
5			All site personnel trained in LOTO Program.
6			100% Safe LOTO procedures observed.
7			Coaching on LOTO observed.
8			A competent person for excavation is on-site when excavation is performed.
9			Utility check performed, reconfirmed and documented before excavation or drilling per FLD 34.
10			At least one utility competent person is on-site.
11			Competent person determines appropriate protection to prevent excavation cave in.
12			Guardrails or fences placed around excavations near walkways or roads.
13			Excavation locations lighted/or otherwise made visible at night.
14			Ladders or ramps are provided to access and exit trenches more than 4 feet deep and within 25 ft of any entrance.
15			All excavated material, personnel, and heavy equipment are at least 24-inches from the edge of all trenches.
16			100% safe utility mark, excavation, and trenching observed
17			Coaching on safe utility mark, excavation and trenching observed.
18			Confined space entry (CSE) permit procedure in place and communicated to all.
19			CSE permit procedure used: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Pre-entry review <input type="checkbox"/> Safety watch/attendant <input type="checkbox"/> Safety watch protected same as entrants <input type="checkbox"/> Retrieval system </div> <div> <input type="checkbox"/> Appropriate rescue available <input type="checkbox"/> Continuous monitoring for ___%O₂ ___%LEL & TOX: __, __, __, __ </div> </div>
20			CSE employee training documented.
21			100% safe CSE observed.
22			Coaching on CSE observed.

Item No.	Yes	No	Element
Comments/Additional Information:			

ELECTRICAL

Item No.	Yes	No	Element
1			Warning signs indicate the presence and location of high voltage equipment, 250 V or greater.
2			Qualified persons only permitted to work within 10 feet of any exposed live electrical conductors.
3			Electrical equipment and wiring properly guarded.
4			Electrical lines, extension cords, and cables guarded and properly maintained.
5			Extension cords kept dry out of puddles and rain.
6			Damaged equipment tagged out.
7			GFCIs used as appropriate.
8			Extension cords are rated for hard or extra hard outdoor use.
9			Underground electrical lines located and indicated per FLD 34.
10a			Arc flash assessments are performed as required.
10b			PPE for arc flash is provided.
10c			PPE for arc flash is appropriate.
11			100% safe electrical work observed.
12			Coaching on safe electrical work observed.
Comments/Additional Information:			

WALKING AND WORKING SURFACES

Item No.	Yes	No	Element
1			Access ways, stairs, ramps, and ladders free of ice, mud, snow, or debris
2			Mobile offices/labs have fixed stairs and handrails.
3			Work areas kept free of debris and equipment.
4			<i>Material in storage is protected from falling or collapse by effective stacking, blocking, cribbing, etc.</i>
5			<i>Walkways and aisles are kept clear.</i>
6			<i>Materials are not stored on scaffolds or runways in excess of normal placement or in excess of safe load limits.</i>
7			<i>Work areas and means of access are maintained safe and orderly.</i>
8			<i>Tools, materials, extension cords, hoses or debris do not cause tripping or other hazards.</i>

Item No.	Yes	No	Element
9			<i>Storage and construction-sites are kept free from the accumulation of combustible materials.</i>
10			Waste materials and rubbish are placed in containers or, if appropriate, in piles.
11			Waste materials are disposed of in accord with applicable local, state, or federal requirements.
12			100% safe walking and working surfaces observed.
13			Coaching on safe walking and working surfaces observed.
Comments/Additional Information:			

MATERIAL HANDLING

Item No.	Yes	No	Element
1			Mechanical lifting is available and used whenever possible.
2			Employees are trained in and use safe lifting techniques.
3			Repetitive motion tasks are evaluated and addressed in the HASP.
4			Repetitive injury prevention is discussed during indoctrination.
5			Repetitive injury prevention is a regular topic at daily meetings.
6			100% material handling observed.
7			Coaching on safe material handling observed.
Comments/Additional Information:			

FIRE PREVENTION/PROTECTION

Item No.	Yes	No	Element
1a			Hot Work Checklists completed (FLD 36).
1b			If Hot Work Permit(s) required: <input type="checkbox"/> Permit(s) up to date. <input type="checkbox"/> Closed out permit(s) on file.
2			Smoking restricted to designated area.
3			Fire lanes established, clearly designated, and maintained.
4			Flammable/combustible liquid dispensing transfer systems grounded and bonded.
5			Proper flammable materials storage used.
6a			Fire alarm established.
6b			Workers aware of established fire alarm
7			Fire extinguisher(s) appropriately located.
8			Fire extinguisher(s) appropriate for fire hazard potential.
9			Location and use of fire extinguisher(s) known by all personnel.
10			Fire extinguisher(s) checked before each shift.
11			Fire extinguisher(s) inspected monthly.
12			Fire extinguisher(s) inspected yearly.
13			Combustible materials segregated from ignition sources.

Item No.	Yes	No	Element
14			Incompatibles segregated.
15			100% fire prevention/protection observed.
16			Coaching on fire prevention/protection observed.
Comments/Additional Information:			

MOTOR VEHICLES/HEAVY EQUIPMENT

Item No.	Yes	No	Element
1			Highway driving safety addressed in HASP.
2			Drivers assigned to vehicles based on experience and training.
3			Construction equipment inspected before each use. <input type="checkbox"/> Inspections documente. <input type="checkbox"/> Inspection documents on file.
4			Inspection issues identified are corrected.
5			Unsafe equipment tagged out and reported.
6			Certificates on site for operators of equipment requiring licenses or certifications.
7			All safety appliances/guards in place.
8			Equipment shut down for fueling.
9			Construction equipment has back-up alarms or spotters are used if 360° visibility restricted.
10			Loads are secure before transport.
11			Roads and structures inspected for load capacity per vehicle weights.
12			A Traffic Control Plan is in effect.
13			100% safe vehicle and equipment operation observed.
14			Coaching on safe vehicle and equipment operation observed.
Comments/Additional Information:			

HAND AND POWER TOOLS

Item No.	Yes	No	Element
1			Guards and safety devices in place and used.
2			Tools inspected before each use.
3			Tools tagged out, if defective.
4			Eye protection areas identified and protection worn.
5			Non-sparking tools available.
6			Coaching on safe tool operation observed.
Comments/Additional Information:			

WELDING AND CUTTING

Item No.	Yes	No	Element
1			Only qualified welders permitted.
2			Hot work permitting system in use.
3			Fire watch provided.
4			Equipment inspected before use.
5			Welding equipment properly grounded.
6			Appropriate PPE worn: <input type="checkbox"/> Proper helmets and shields (including proper tint for UV protection) <input type="checkbox"/> Leathers or other protection from sparks/slag
7			Air sampling/monitoring is performed to assess toxic fume exposure.
8			Adjacent workers protected from welding flash.
9			Oxidizers and fuel cylinders separated by 20 feet or ½ hour fire wall in storage.
10			Fuel cylinders secured in upright position.
11			Fire extinguishers present at all welding and cutting operations.
12			100% safe welding and cutting operations observed.
13			Coaching on welding and cutting observed.
Comments/Additional Information:			

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY PLAN (EPSP)

Item No.	Yes	No	Element
1			Environmental Protection and Sustainability Plan posted.
2			EPSP reviewed as part of site indoctrination.
3			EPSP Checklist used to review Environmental Compliance.
4			100% environmental compliance observed.
5			Coaching on environmental compliance observed.
Comments/Additional Information:			

MISCELLANEOUS

Item No.	Yes	No	Element
1			Overhead hazards are noted, communicated to all, and labeled as needed.
2			For large construction projects, EHS Inspection (Checklist is used.
3			Copies of contracts with client and sub-contractors are on-site, WESTON's role regarding site health and safety responsibilities are clear in these, and site manager(s) understands.
4			Sub-contractors have received approved copies of their safety plan or have signified their intent to conform to Weston's safety plan.
5			Site managers understand their responsibilities for sub-contractors' conformance with all OSHA and other health and safety requirements

Item No.	Yes	No	Element
6			Site managers know what to do in the event of an OSHA/agency inspection
7			If warranted based on audit observations, a feedback session was provided to affected employees.
8			
9			
10			
Comments/Additional Information:			

COMMENTS/FEEDBACK PROVIDED:

Appendix E
Mishap Reporting

NOITrack

Open NOI's Search Add New Incident Reports Admin Help Blog

Incident Info Individual Data Investigation File Attachment

☐ Near Incident

Fields marked with * are required

Security	Safety	Computer	Other
<input type="checkbox"/> Threat or Intimidation	<input type="checkbox"/> Vehicle	<input type="checkbox"/> Computer/Technology	<input type="checkbox"/> Environmental
<input type="checkbox"/> Act of Violence	<input type="checkbox"/> Injury	<input checked="" type="checkbox"/> Other	<input type="checkbox"/> Property/Equipment Damage
<input type="checkbox"/> Theft	<input type="checkbox"/> Illness		<input type="checkbox"/> Regulatory Agency
<input type="checkbox"/> Vandalism	<input type="checkbox"/> Exposure		<input type="checkbox"/> Other
<input type="checkbox"/> Violation of Company or Government Security Requirements	<input type="checkbox"/> Other Safety		
<input type="checkbox"/> Other Security			

Was this a single event or the latest in a series(describe)?

Note: This description is limited to 255 characters. If more information is required, add the information in the submitted description.

Date of Incident *

Time of Incident * Hrs min AM PM

☐ Unknown Date ☐ Unknown Time

Please go to NOITrack using the following link to complete mishap reporting. If you are in the field and do not have access to NOITrack, please contact someone in your office to do the reporting for you.

<http://asweb/noitrack/IncidentInfo.aspx>

Questions can be directed to Justin Smith at 610.701.3404.